



Commission for Energy Regulation

An Coimisiún um Rialáil Fuinnimh

Market Monitoring in the Electricity & Gas Retail Markets Decision Paper

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Commission for Energy Regulation

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CER – Information Page

Abstract: The CER has consulted on a new electricity and natural gas retail market monitoring framework, with a range of market indicators to be collected from suppliers and network operators. This Decision Paper outlines the CERs response to the comments received on the 2013 consultation and its decision on all proposals.

Target Audience:

This paper is for the attention of all stakeholders in the retail electricity and natural gas markets and any other interested parties.

Related Documents:

([CER/13/302](#)) Market Monitoring in the Electricity and Gas Retail Markets Consultation Paper, published 19th December 2013.

([CER/12/081](#)) Electricity and Natural Gas Supplier Handbook, published on 15th June 2012.

([CER/11/221](#)) Consultation paper on Market Monitoring in the Electricity & Gas Retail Markets, published on 16th December 2011.

([E10-RMF-27-03](#)) ERGEG Final Guidelines of Good Practice on Indicators for Retail Market Monitoring for Electricity and Gas, published on 12th October 2010.

For further information on this Decision Paper, please contact **Adrienne Costello** (acostello@cer.ie) at the CER.

Executive Summary

On 19th December 2013, the Commission for Energy Regulation, (the CER) published a Consultation proposing an enhanced retail market monitoring framework ([CER/13/302](#)). This Framework outlines the indicators that the CER will collect from suppliers and networks companies on an ongoing basis in order to provide the CER with an effective view of competition in electricity and gas retail markets (as required under legislation). Prior to the publication of the consultation, the CER also met with all the independent suppliers and network operators to discuss their views on the market monitoring proposals.

The CER is required under legislation “*to monitor the level and effectiveness of market opening and the development of competition in the supply of electricity and gas to final customers*” and is required, on foot of this monitoring, to take any action deemed necessary to

- “(i) prevent a distortion or restriction of competition in the supply of electricity to final customers, or*
- (ii) ensure that final customers are benefiting from competition in the supply of electricity”.*

The market monitoring indicators identified in this decision provides the required degree of oversight of market conditions to ensure the CER can readily identify any market issues and take any necessary action in the interests of customers. However, as monitoring will be conducted on an on-going basis, should additional information or data be required in the future to effectively monitor the market or distortion in the market, the CER will seek to collect the necessary information. The indicators set out in this paper are deemed to adhere to the principles of good regulation. A table showing how each indicator meets the principles is presented in Annex 5. While these indicators will be collected on a regular basis, the CER is minded to seek additional information in the future if required and ad hoc queries for data may be required as necessary.

The following points summarise the Commission’s key Decisions, which are set out in more detail in the main body of this decision.

Market Segmentation

The market segmentation refers to the breakdown of the electricity and gas markets. This breakdown is the format by which markets will be segmented in stakeholders market monitoring data submissions. The CER has decided to retain the current method of market segmentation for both gas and electricity. Domestic pay-as-you-go (PAYG) customers will form a separate subset of the domestic category for all indicators. ESB Networks and Bord Gáis Networks (Networks) will be required to submit customer numbers and consumption of gas and electricity customers based on Eurostat bands by supplier once a year. Gas market segments will continue to be reported in CER publications as domestic, IC, FVT and RTF.

Market Conditions & Network Services

Networks will submit data on switching indicators (switching requests, completed switches, repeat switching rate, delayed and failed switches) for all customer categories. Bord Gáis Networks will be required to upgrade its systems to ensure that additional data can be reported (i.e. to include the FVT and RTF segments and to distinguish CoLE from CoS). Suppliers will be required to submit data on the number of domestic dual fuel customers switching on a monthly basis. This will be a new requirement on suppliers.

Networks will be required to continue to submit data on new connections but on an annual basis. In relation to the time taken to connect, Networks will submit data as part of the Networks incentive and monitoring arrangements already in place in the CER. The same applies the repairs indicators (customer minutes lost, customer interruptions and gas restoration).

In order to help provide a more complete picture of customer engagement, suppliers will be required to submit data on renegotiated contracts and on the number of customers defaulting to the supplier's standard tariff.

Disconnection Rates, PAYG Installs and Debt Flagging

Networks will provide data on: completed non-payment of account (NPA) disconnections, incomplete NPA disconnections, time to reconnect, disconnected vacant sites, PAYG meter installations and PAYG customers reverting to credit services. Most of this data will be submitted monthly (as is currently the case). Bord Gáis Networks will be required to upgrade its systems to ensure that data on just NPA disconnections is provided.

Suppliers or networks will not be required at this time, to submit data on self-disconnection as a mandatory requirement at this time as no real-time information on consumption is available at present. However, given the importance of ensuring that all customers are protected, the CER would suggest that if suppliers become aware of this information or of a method to measure such information, then data should be collected and reported.

Networks will be required to continue current reporting of debt flags raised, cancelled and accepted at supplier level (but with the inclusion of FVT in gas). Such data will be required on a quarterly basis.

Market Structures

Networks will be required to continue their current reporting on market share by customer numbers and consumption for each current market segment and by supplier. 'Vulnerable customers' as a separate subset of the domestic market should form part of the market share report. Suppliers will be required to submit information on the markets that they are active in on an annual basis.

In order to measure the options available to customers and the choices customers make, suppliers will be required to submit data on the diversity of contracts for domestic customers (including specific information on PAYG and vulnerable customers) and small business/IC customers on a quarterly basis. Such information will be published at an aggregate level to ensure that any commercially sensitive information that is provided is protected.

Suppliers will also be required to submit information on end user price (measured by customer numbers, consumption and revenues) for all individual market segments.

Suppliers will be required to submit data on retail margins on an annual basis. The CER has considered carefully the comments from respondents and has reduced the level of detail associated with the indicator. The units of measure will be: total revenue, energy costs, total network and other non-supply or energy costs, supply costs and supply margin. Energy/wholesale costs, supply costs and supply margin are to be broken down by domestic and non-domestic customer categories. This data will not be published. Retail margins should inform the CER as to how competition is developing and to ensure that customers are benefitting from competition.

Suppliers will be required to submit high-level data on arrears and on payment plans of domestic customers on a quarterly basis. This data will be published at an aggregate level only.

Suppliers will not be required to submit data on the penalties applied to customers.

Customer Satisfaction

Suppliers and networks will be required to submit data on an annual basis on the number of customer complaints. The categories and the definition of complaint are detailed in the main body of this report. Suppliers will not be required to submit data on the number of customer enquiries.

Suppliers will also be required to submit an annual report setting out their compliance with the CER's Natural Gas and Electricity Supplier Handbook. All suppliers over or under the de minimis threshold must provide data on complaints and Codes of Practice reports.

Reporting and Implementation

De minimis thresholds of 1% of consumption or 4 customers in electricity and 1% of customers in gas will be introduced. Suppliers with market shares of less than the threshold will not be required to submit monitoring data, with the exception of market satisfaction indicators and codes of practice reporting, to the CER until the threshold is reached. The CER will not report data for suppliers with market shares of less than the threshold for any indicator. Data for these suppliers will be included in an 'others' category for the indicators that the CER has data for such suppliers.

In this Decision, the CER has also provided a proposed phased timeline for the implementation of this decision and has outlined possible dates for reports on certain indicators to be submitted. The CER would highlight that it will meet with individual suppliers and networks to discuss implementation matters in due course and a timeframe for implementation and the format in which data will be received, will be discussed as part of the next steps to this decision. The identified frequency for the reporting of data inputs is the maximum frequency at which the CER will collect data on each indicator, and the CER may review these frequencies through the implementation process and the associated interaction with stakeholders over time.

All data submitted will be analysed and considered by the CER internally on an ongoing basis, as data is submitted. The decision for each indicator identifies the detail that will (or will not) be published. Where data will be published, this will be integrated into the CERs retail market monitoring reports which will also be reviewed as part of the next steps to this decision paper.

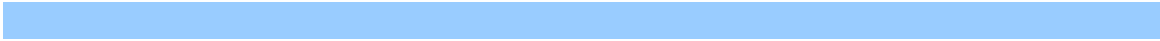


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1.0 Introduction

1.1 The Commission for Energy Regulation

The Commission for Energy Regulation (CER) is Ireland's independent energy and water regulator. The CER was established in 1999 and now has a wide range of economic, customer protection and safety responsibilities in energy. The CER is also the regulator of Ireland's public water and wastewater system.

The CER's primary economic responsibilities in energy cover electricity generation, electricity and gas networks, and electricity and gas supply activities. As part of its role, the CER jointly regulates the all-island wholesale Single Electricity Market (SEM) with the Utility Regulator in Belfast. The SEM is governed by a decision-making body known as the SEM Committee, consisting of the CER, the Utility Regulator and an independent member. The overall aim of the CER's economic role is to protect the interests of energy customers. The CER has an important related function in customer protection by resolving complaints that customers have with energy companies.

The CER's core focus in safety is to protect lives and property across a range of areas in the energy sector. This includes safety regulation of electrical contractors, gas installers and gas pipelines. In addition the CER is the safety regulator of upstream petroleum safety extraction and exploration activities, including on-shore and off-shore gas and oil.

In 2014 the CER was appointed as Ireland's economic regulator of the Irish public water and wastewater sector.

Further information on the CER's role and relevant legislation can be found on the CER's website at www.cer.ie.

1.2 Purpose of this Paper

The CER is required under legislation "*to monitor the level and effectiveness of market opening and the development of competition in the supply of electricity and gas to final customers*" and is required, on foot of this monitoring, to take any action deemed necessary to:

- "(i) prevent a distortion or restriction of competition in the supply of electricity to final customers, or*
- (ii) ensure that final customers are benefiting from competition in the supply of electricity".*

These requirements stem from the 3rd Package of European energy legislation and were transposed into Irish law by S.I. No. 450 of 2010 and S.I. No. 630 of 2011 (the S.I.s covering electricity and gas, respectively). In this context, the CER reviewed its current market monitoring activities and the CER published a

consultation paper in December 2013 proposing an enhanced market monitoring framework – see [CER/13/302](#), ‘Market Monitoring in the Electricity and Gas Retail Markets’. This consultation set out the data to be collected from suppliers and network operators and was designed to provide the CER with an effective view of competition in electricity and gas retail markets (as required under legislation)¹.

This decision paper sets out the CERs decisions in relation to the indicators that will inform its retail market monitoring activity. In developing this decision paper, the CER has considered fully all comments received to the 2013 consultation² and has finalised a proportionate framework which will allow the required degree of oversight of market conditions to ensure the CER can readily identify any market issues and take any necessary action in the interest of customers (as required under legislation). In this regard, the CER would also note that, while this paper sets out the indicators that are to be collected from suppliers and network operators on an on-going basis, ad hoc requests for information will continue to be required (though to a lesser extent than would have been the case). In addition, as market conditions and dynamics change over time, there may be a necessity to gather new or altered indicators in the future. In essence, this framework will be subject to ongoing review.

The CER has set out indicative dates for implementation in the implementation section.

1.3 Comments Received

The CER received 10 submissions to the 2013 Consultation Paper (CER/13/302). Submissions were received from the following organisations or individuals:

- Airtricity.
- Bord Gáis Energy.
- Bord Gáis Networks.
- The Competition Authority.
- Electric Ireland.
- Energia.
- ESB Networks.
- National Electricity Association of Ireland (NEAI).
- Society of St. Vincent de Paul (SVP).
- Vayu.

All responses received are published alongside this paper.

¹ This consultation document was informed by the responses to another market monitoring consultation in 2011, CER/11/221.

² The 2013 consultation refers to CER/13/302 ‘Market Monitoring in the Electricity and Gas Retail Markets’.

1.4 Structure of this paper

- **Section 2.0** Market Monitoring Framework Decision

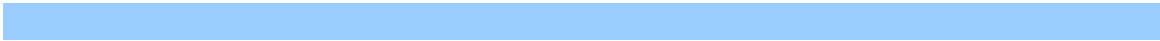
This section outlines the CERs decisions with regard to the consultation questions. The responses to the consultation and the CERs response are contained in Annex 2.

- **Section 3.0** Format and Implementation of New Market Monitoring Framework

This section outlines the indicative timeline for implementation and other implementation considerations.

- **Section 4.0** Conclusions and Next Steps.

This section identifies the next steps.



2.0 Market Monitoring Framework Decisions

2.1 Introduction

Following the transposition of the market monitoring provisions of the 3rd Energy Package and the deregulation of retail markets³, the CER published a consultation ([CER/13/302](#)) on a new retail market monitoring framework⁴. The proposed framework outlined a range of indicators that the CER would collect from networks and suppliers to use in the monitoring of the electricity and gas retail markets. This framework was needed to ensure compliance with the specific monitoring indicators that were identified in legislation⁵, as well as the supplementary information that would assist the CER in its role of determining if there are any distortions or restrictions to competition and whether competition is benefiting final customers.

In the 2013 consultation paper, the CER proposed a comprehensive list of indicators for consultation, which included a number that already form part of the CER's existing market monitoring. Many of the new indicators were based on ERGEG guidelines⁶ and a number of others were proposed with regard to monitoring activities in other jurisdictions and what was perceived to be important in the context of market monitoring in Ireland (for example, debt flagging). All consultation proposals and questions can be found in Annex 1.

This section presents the CER's decision on the metrics that will form the new market monitoring framework. The decision on each indicator is structured in the following format:

³ Full deregulation of all the electricity market segments, gas business segments and the deregulation of the domestic gas market on 1st July 2014.

⁴ This consultation followed on from an initial consultation in 2011 ([CER/11/221](#)).

⁵ Legislation stipulates that monitoring shall include but is not limited to monitoring:

- (i) Final tariffs charged to domestic customers including those on prepayment systems,
- (ii) Rates of customer switching between licensed electricity and gas suppliers,
- (iii) Disconnection and de-energisation rates,
- (iv) Charges for, and the execution of, maintenance services,
- (v) Complaints by domestic customers.

⁶ The majority of these new proposed indicators were based on an ERGEG document on Guidelines of Good practice on Retail Market Monitoring (against the backdrop of the 3rd Package).

Indicator	Unit	Categories	Reporting & Provider	Publication	New/ current/ enhanced
Name of indicators	The unit of measure: •Number •Customers •Consumption •Etc.	The <u>Category</u> of customers to be reported: Domestic, Domestic PAYG, Small business/IC, Medium business/ FVT, LEU/RTF, All categories – refers to all the above separately reported. •Whether data has to be provided for both <u>gas and electricity activities</u> . •If the detail on <u>suppliers</u> is to be provided	The maximum frequency at which data reports are to be submitted to CER & by whom: Suppliers or networks. Identifies if monthly, quarterly/ annual breakdown of data may be required.	Identifies where all data may be published. However, it is at the discretion of the CER to publish this data. Also identifies where certain data will not be published.	Identifies if the indicator is new to the CERs market monitoring activity. If only an element of the unit is new, this is identified as an enhanced indicator.

The following details the CER's decision for each consultation proposal. A summary of the responses to the consultation questions and the CERs response is contained in Annex 2.

2.2 Electricity and Gas Market Segmentation

Consultation Proposals

The market segmentation refers to the breakdown of the electricity and gas markets. This breakdown is the format by which markets will be segmented in stakeholders market monitoring data submissions. This section of the consultation paper covers the methodology of market segmentation in both electricity and gas, the inclusion of PAYG as part of the segmentation and the data proposed to be provided by the networks company in relation to customer segments.

The consultation background to the proposals and questions can be found in Annex 1.

CER's Decision

The CER has decided to continue with the current method of segmentation but with the addition of PAYG⁷ customers as a subset of the domestic category in both gas and electricity. This segmentation will be required for each indicator as relevant. Any alterations to this breakdown are identified in the summary table of relevant decisions. The CER has decided to collect consumption and customer numbers data in the Eurostat bands and by supplier once a year from networks. The CER has decided not to change the naming convention of gas.

In coming to its decision the CER has taken into consideration comments received from stakeholders in relation to the costs to implement a revised segmentation of the market and the benefits of such a change. Given that market monitoring could be achieved (not compromised) with the current segmentation, the current approach has been maintained. This segmentation will also allow for comparison with historic data.

Decision 1 - The current methodology of segmentation will continue to be required for both gas and electricity and data will be collected based on this segmentation from suppliers and networks. Domestic PAYG customers will form a separate subset of the domestic category.

Decision 2 - Networks companies will be required to submit customer numbers and consumption in gas and electricity based on Eurostat defined consumption bands by supplier once a year.

Decision 3 - The CER will not report on gas market segments under the proposed naming conventions. The gas market segments will continue to be reported under the following:

- Domestic Market – non-business customers.
- Industrial and Commercial (IC) market - supply point capacity below 3,750kWh and annual quantity of below or greater than 73,000kWh of gas annually.
- Fuel Variation Tariff (FVT) market - supply point capacity above 3,750kWh and annual quantity of greater than 73,000kWh of gas annually.
- Regulated Tariff Formula (RTF) market – sites with annual consumption of between 5.5GWhs and 264GWhs.

The requirement will be as follows:

⁷ PAYG refers to the PAYG meters that have been installed free of charge by ESB Networks and BGN for those in financial difficulty (but including the lifestyle choice meters in gas). The PAYG category refers to the customers that remain on prepayment mode and have not reverted to credit mode.

Indicator	Unit	Categories	Reporting & Provider	Publication	New/ current
Market Segmentation	To form the basis of the market segment breakdown for each indicator. 'All segments' refers to the individual reporting of each of the segments identified in the next column.	Electricity: -Domestic. -Domestic PAYG. -Small business market. -Medium business market. -Large energy users. Gas: -Domestic. -Domestic PAYG. -IC market. -FVT market. -RTF market.	As indicated in each decision.		Current.
Eurostat bands – customers & consumption	Customer numbers. Consumption MWhs.	Domestic Electricity: DA < 1MWhs DB 1 - 2.5 MWhs DC 2.5 - 5 MWhs DD 5 – 15 MWhs DE >15 MWhs Business Electricity: IA <20 MWhs IB 20 <500 MWhs IC 500 <2,000MWhs ID 2,000 <20,000 MWhs IE 20,000<70,000 MWhs IF 70,000 <150,000MWhs Domestic gas: D1 <20GJ D2 20-200GJ D3 >200GJ Business gas: I1 < 1,000GJ I2 1,000-10,000GJ I3 10,000<100,000GJ I4 100,000<1,000,000GJ I5 1,000,000<4,000,000GJ.	Provider: Networks. Frequency: annually.	Annually.	New.

Table 1 Market Segmentation

2.3 Market Condition & Network services

This section outlines the CER's decision in relation to market condition and network services indicators. These indicators should show how well services or mechanisms in the market function, for example switching and connections etc. ERGEG identifies that well-functioning mechanisms should help a well-structured market to deliver beneficial outcomes which in turn leads to high levels of customer satisfaction. In addition, these data provide an indication of the level of customer engagement with the market.

2.3.1 Switching Rates and Switching Process

Consultation Proposals

Monitoring of switching is explicitly required in legislation. Switching refers to the number of customers changing supplier in a given period. The switching rate is a key indicator of the level of customer engagement within the market and the level of competition between suppliers in the marketplace. A high switching rate (which counts all switches in the period be they attributable to a customer that has switched multiple times in the period or just once) indicates a high level of customer engagement.

Repeat switching refers to a customer that switched multiple times in a period. It is important to know if customers switched once or more than once as it is reflective of the actual level of switching. If total switching is comprised primarily of customers that switched more than once, this may be indicative of a degree of customer inertia in the market.

When a switch is not completed (times out or is cancelled), this is considered a failed switch. Together with delayed switches, this indicator would provide information on whether the switching process is operating effectively for customers. A delayed switch is one which is completed outside of the recommended timeframe to complete a switch. The 3rd Package requires that switches requested by customers are completed within 3 weeks. The CER proposed that a delayed switch will occur when:

- A switch with a customer read – over 3 weeks of the MRSO/GPRO receiving the request from the supplier.
- A switch with a scheduled read – over 2 weeks of the scheduled read.

The 2013 consultation document proposed collecting monthly data on the switches requested and completed in both gas and electricity. The indicator on switches completed was to take account of the proportion that were also a change of legal entity (CoLE) and it was proposed that suppliers submit data on dual fuel switching. Data on repeat switching was proposed to be submitted by

networks on an annual basis and delayed and failed switches on a quarterly basis.

Further detail on the requirements included in the consultation papers are in annex 1

CER's Decision

Given that switching is specifically required to be monitored in legislation and the broad agreement with the proposal, the CER has decided to maintain the indicators as set out in the 2013 consultation paper. The monitoring of switching is fundamental in the monitoring of the retail market as it is a key indicator of customer engagement and competition, and it was a key criterion for the deregulation of the domestic electricity and gas markets.

The CER would highlight that information on CoLE is necessary and that systems must be appropriately upgraded as required to take account of this. The CER also requests that systems are upgraded to ensure that all customer categories can be reported (FVT and RTF in gas).

The CER has changed the reporting frequency from quarterly to annually for two indicators, failed and delayed switching. Data must be provided for all customer categories as indicated in the table below.

Decision 4

The CER will require networks to submit data on the switching indicators as described in the table below. Any necessary changes to current reporting should be implemented as soon as possible after this decision has been published.

Suppliers will be required to submit data on the number of domestic dual fuel customers switching on a monthly basis as described in the table below.

The following table outlines the data to be submitted as part of the switching indicators.

Indicator	Unit	Categories	Reporting & Provider	Publication	New/ current
Switches Requested	•Number of requests.	•Electricity & gas. •Supplier. •All customer categories: domestic, PAYG ⁸ , small business/IC, medium business/FVT & LEU/RTF.	•Provider: Networks. •Reporting: Monthly.	All.	Current in electricity. New for gas.

⁸ Total in gas (i.e. lifestyle choice & financial hardship), financial hardship in electricity.

Indicator	Unit	Categories	Reporting & Provider	Publication	New/ current
Switches completed	<ul style="list-style-type: none"> •Total Number of switches. •Gains & losses by supplier. •Proportion of total that were also a CoLE (only networks). 	<ul style="list-style-type: none"> •Electricity & Gas. •Supplier. •All customer categories: domestic⁹, PAYG, small business/IC, medium business/FVT & LEU/RTF. 	<ul style="list-style-type: none"> •Provider: Networks. •Suppliers: dual fuel customers switching (just domestic). Reporting: Monthly (as part of the Requests report). 	All.	Enhanced current indicator. New elements: CoLE breakdown; gas FVT & RTF switching ; dual fuel switching.
Repeat Switching Rate	<ul style="list-style-type: none"> •Number of times customer has switched in a year based on GPRN/MPRN (identify where a CoLE is also associated with a switch). 	<ul style="list-style-type: none"> •Electricity & Gas. •All customer categories: domestic, PAYG, small business/IC, medium business/FVT & LEU/RTF. 	<ul style="list-style-type: none"> •Provider: Networks. •Reporting: annual (no requirement to provide monthly/quarterly breakdown, just dates of switches). 	All.	New.
Delayed Switches	<ul style="list-style-type: none"> •Total number of delayed switches. •Number falling into each week band. 	<ul style="list-style-type: none"> •Electricity & Gas. •Supplier. •All customer categories: domestic, PAYG, small business/IC, medium business/FVT & LEU/RTF. •Bands (2-3; 3-4; 5-6 Weeks etc). 	<ul style="list-style-type: none"> •Provider: Networks. •Reporting: Annual (monthly breakdown required). 	All, except supplier detail.	New.
Failed Switches	<ul style="list-style-type: none"> •Total number of failed switches. 	<ul style="list-style-type: none"> •Electricity & Gas. •Suppliers. •All customer categories: domestic, PAYG, small business/IC, medium business/FVT & LEU. 	<ul style="list-style-type: none"> •Provider: Networks. •Reporting: Annual (monthly breakdown required). 	All, except supplier detail.	New.

Table 2 Switching Indicators

⁹ DG1-1, DG1-2, DG2-1 and DG2-2 breakdown in electricity (this breakdown only to be provided by Networks, not suppliers).

2.3.2 Renegotiations

Consultation Proposals

The 2013 consultation paper suggested the collection of data on renegotiations and the number of customers defaulting to the standard tariff. ERGEG defines a renegotiation as changing to a new contract with the existing supplier (excluding the automatic renewal of a current contract). Data on renegotiations complements that collected on switching and helps provide a more complete picture of customer engagement and the options open to customers.

Defaulting to the standard tariff refers to the number of customers that defaulted to the supplier's standard tariff on completion of their contract period. Defaulting to the standard tariff shows whether customers are engaging with the market and if they are aware of the possibility of defaulting to the standard rate after a limited term discount.

The consultation document proposed the collection of data from suppliers on a monthly basis for renegotiations and quarterly for defaulting to standard tariffs in electricity and gas broken down by domestic, PAYG and small/IC business.

Further detail on the requirements included in the consultation papers are in annex 1

CER's Decision

The CER has decided maintain the indicators set out in the consultation paper, but has altered the frequency of data submissions on defaulting to the standard tariff to annual (with a quarterly breakdown). The CER considers that sites with bespoke contracts should be excluded from the renegotiations data that is reported.

The collection of data on renegotiations complements the switching data and gives a more complete picture of customer engagement. If customers are found not to be engaging with suppliers, this could potentially indicate an issue in the market (and may require further investigation). While 'renegotiations' is not specifically identified in legislation, the CER agrees with ERGEG's suggestion that it is beneficial to collect data on renegotiations in order to get a complete picture of customer engagement. Such an indicator can be linked to the CER's duty of customer protection and data on renegotiations are also necessary in showing the options that are available to customers.

Defaulting to the standard tariff indicator will assist the CER in determining if actions need to be taken to ensure that customers are better informed.

Decision 5

The CER requires suppliers to submit information on renegotiations and defaulting to the standard tariff, as outlined in the table below.

The following table outlines the data to be submitted by suppliers as part of the renegotiations and defaulting to standard tariff indicators.

Indicator	Unit	Categories	Reporting & Provider	Publication	New/ current
Renegotiations	<ul style="list-style-type: none"> •Number of complete renegotiated contracts. •Number of customers contacting suppliers to renegotiate (whether successful or not). 	<ul style="list-style-type: none"> •Electricity & Gas. •Domestic¹⁰, PAYG & Small business/IC. 	<ul style="list-style-type: none"> •Provider: Suppliers. •Reporting: monthly. 	•All, except supplier detail.	New.
Defaulting to Standard Tariffs	<ul style="list-style-type: none"> •Number of customers defaulting to standard tariff. 	<ul style="list-style-type: none"> •Electricity & Gas. •Domestic, PAYG & Small business/IC. 	<ul style="list-style-type: none"> •Provider: Suppliers. •Reporting: annual (with quarterly breakdown). 	•All, except supplier detail.	New.

Table 3 Renegotiations & Defaulting to Standard Tariffs

2.3.3 Connections

Consultation Proposals

Connections refer to new sites registered and sites that are reconnected/reenergised. Connections of customers to the electricity and gas networks, respectively, are part of the customer's interaction and experience with the market and impact on the market share of suppliers.

The CER currently receives data from both Network companies on the number of new connections/registrations. The 2013 consultation paper proposed the continued collection of new connections data and the collection of data on the average time to connect and the range of times to connect across customer categories.

Further detail on the requirements included in the consultation papers are in annex 1

CER's Decision

The CER has decided to maintain the new connections indicator as set out in the 2013 consultation. The CER has changed the frequency for the submission of this data to annual. The CER is of the view that not only is data on new

¹⁰ DG1-1, DG1-2, DG2-1 and DG2-2 breakdown in electricity.

connections an indicator of market activity; it is also an indicator of the awareness of customers to the fact that they have a choice of supplier to connect with.

The CER has decided not to collect data on the time to connect given the issues regarding reporting of the data raised by networks in the consultation and the fact that a similar indicator is contained in the ESNB performance review. While this is the case, the CER considers that no customer should be negatively affected by issues associated with the time to connect and such is monitored by the networks team within CER.

Decision 6

The CER will require ESB Networks and Bord Gáis Networks to submit data on new connections on an annual basis as described in the table below. Data on the average time to connect will not be required to be submitted to the Retail team in CER.

The following table outlines the data that will be submitted by Networks in relation to the connections indicator.

Indicator	Unit	Categories	Reporting & Provider	Publication	New/ current
New connection/ registrations	<ul style="list-style-type: none"> •Number of new registrations. •Proportion that are reconnections. 	<ul style="list-style-type: none"> •Supplier. •All customer categories: domestic, PAYG, small business/IC, medium business/FVT & LEU/RTF. 	<ul style="list-style-type: none"> •Provider: Networks. •Reporting: annual (with quarterly breakdown). 	•All data.	<p>Enhanced current indicator. New element: proportion that are reconnections.</p> <p>Frequency has changed from monthly to quarterly.</p>

Table 4 New Connections

2.3.4 Repairs

Consultation Proposals

Legislation stipulates that the charges for and the execution of maintenance services are monitored. ERGEG supports the idea of defining quality of service obligations for repairs and the 3rd package requests that the time taken by networks to make repairs is monitored. This indicator is part of the measurement of quality of service experienced by customers and will identify instances of interruptions to customer supply.

Under the proposal in the 2013 consultation paper, it was proposed that networks submit the data on repairs in January or February of the following year. For

electricity the measures include Customer Minutes Lost (CML) and Customer Interruptions (which measure the average time to complete repairs carried out by ESB Networks). The measure in gas was the restoration of gas supply by the end of the following day after notification. Further detail on the requirements included in the consultation papers are in annex 1

CER's Decision

The CER has decided that Repairs will not be monitored through the retail market monitoring process, but rather through the ongoing networks monitoring and incentives process each year.

Decision 7

Repairs will be monitored annually through the ongoing networks monitoring and incentives process in the CER. Data will not be required to be submitted to the Retail Team in CER.

2.3.5 NPA Disconnection Rates and PAYG Installs

Consultation Proposals

Legislation specifically states that disconnections are to be monitored. Disconnections refer to the act of interrupting the supply of electricity or gas to a site. Disconnections highlight the number of customers that may have fallen into financial difficulty and have had supply to their premise turned off, despite customer protection measures already in place. Currently the CER publishes data on disconnections for non-payment of account (NPA).

Suppliers are required to treat disconnections as a last resort and must provide customers with assistance to manage their bills (as stipulated in the Supplier Handbook¹¹). The CER already monitors disconnection levels to ensure that disconnections are minimised and to identify if additional safeguards / assistance are required. The CER publishes the data it collects per supplier. It is the CER's responsibility to ensure that customers are protected and that disconnections are a last resort. There are a number of measures in place to ensure disconnections of customers in difficulty are minimised and the CER must monitor the market to ensure that such measures are effective.

The consultation document proposed the collection of data on NPA specific disconnections, the time to reconnect, the self-disconnection of PAYG customers, the number PAYG customers for financial hardship and the number of PAYG customers reverting to credit mode. The CER proposed that data be submitted on the geographic location of both disconnected sites and sites with PAYG meters installed. Such information will assist the CER in determining if there are certain "hotspots" for disconnections/PAYG meters and will also help in ensuring that the allocation of network resources meets demand. With regard to

¹¹ [CER12/081](#), Electricity and Natural Gas Supplier Handbook.

self-disconnection, the CER considers it is important to monitor if such customers are still having difficulty even with a PAYG meter installed. Further detail on the requirements included in the consultation papers are in annex 1

CER's Decision

While noting the comments raised in the responses to the consultation, the CER has decided to maintain the NPA disconnection, time to reconnect and PAYG indicators identified in the consultation, with the addition of a number of indicators as suggested in the responses to the consultation and based on current monitoring (incomplete disconnections, disconnected vacant sites).

The CER would highlight that information on NPA-specific disconnections is necessary and that systems must be appropriately upgraded as required to take account of this.

To take account of an SVP comment, the CER has introduced an additional segmentation to the domestic electricity market as part of the PAYG installs indicator. Data should be broken into DG1-1, DG 1-2, DG 2-1 and DG 2-2 which takes account of those with day/night or 24hr meters and location.

The CER is of the view that data on self-disconnection is of importance but given the lack of real-time information, there is no accurate measure for such at present and therefore no data will be required from stakeholders at this time. However, the CER will consider a potential measure based on vend information.

Currently, the CER circulates disconnection data to suppliers to validate and notes that this process will continue to be required as part of the new market monitoring framework.

The CER would like to highlight that while ongoing monitoring of the disconnection and PAYG indicators will occur, it will continue to undertake audits of suppliers compliance with the Codes of Practice (e.g. in the area of disconnections or PAYG).

Decision 8

The CER will require data on completed NPA disconnections, incomplete NPA disconnections, time to reconnect, disconnected vacant sites, PAYG meter installs and PAYG customers reverting to credit to be submitted by networks as per the table below. The timelines for implementation will be considered following discussion with the Networks companies.

Suppliers and networks will not be required to submit data on self-disconnection at this time. Where a supplier does avail of such information, it would be beneficial to retain the data and report such to the CER. The CER would also highlight that it is important for suppliers to contact such customers to ascertain the reasons why.

The following table outlines the data to be submitted as part of the disconnections and PAYG indicators.

Indicator	Unit	Categories	Reporting & Provider	Publication	New/ current
Completed NPA Disconnections	<ul style="list-style-type: none"> •Number of customers disconnected (at GPRN/MPRN level). Includes all NPA associated CLs, DMs & CTSRs in gas. 	<ul style="list-style-type: none"> •Electricity & Gas. •Suppliers (billed & current). •All customer categories: domestic, small business/ IC, medium business/ FVT & LEU/RTF. •Geographic location. 	<ul style="list-style-type: none"> •Provider: Networks. •Reporting: monthly. 	•All data.	<p>Enhanced current indicator.</p> <p>New elements: NPA specific disconnection in gas; geographic location in gas; billed & current supplier.</p>
Incomplete NPA disconnections	<ul style="list-style-type: none"> •Number of failed disconnections •Reason for failed disconnections¹². 	<ul style="list-style-type: none"> •Electricity & Gas. •Suppliers (billed & current). •All customer categories: domestic, small business/IC, medium business /FVT & LEU/RTF. 	<ul style="list-style-type: none"> •Provider: Networks. •Reporting: monthly (as part of the completed report). 	•All data.	<p>Current indicator in electricity.</p> <p>New indicator for gas.</p>

¹² CoLE by supplier, customer paid supplier, no adult present, access refused, sickness/bereavement, safety issue, supplier phone unanswered, PAYG installed, other.

Indicator	Unit	Categories	Reporting & Provider	Publication	New/ current
Time to Reconnect	•Number of reconnected sites by MPRN/ GPRN, excluding where there was a CoLE on reconnection	<ul style="list-style-type: none"> •Electricity & Gas. •Domestic customers. •Date of disconnection & reconnection. •GPRN/ MPRN. 	<ul style="list-style-type: none"> •Provider: Networks. •Reporting: quarterly. 	•All data.	<p>Enhanced current indicator.</p> <p>New elements /changes: CoLE information ; no information required on business customers.</p> <p>Reporting frequency changed from monthly to quarterly in electricity. Quarterly reporting required in gas.</p>
Disconnected vacant premises	•Number of sites disconnected for NPA but are suspected of being vacant.	<ul style="list-style-type: none"> •Based on observation of network technicians. •Elec & gas. •Supplier. •All customer categories: domestic, small business/IC, medium business/FVT & LEU/RTF. 	<ul style="list-style-type: none"> •Provider: Networks •Reporting: Monthly. 	•All data.	Current.

Indicator	Unit	Categories	Reporting & Provider	Publication	New/ current
PAYG Meters for financial hardship	<ul style="list-style-type: none"> •Number of free PAYG meters installed¹³. •Number of PAYG meters not successfully installed & reasons¹⁴. 	<ul style="list-style-type: none"> •Electricity & Gas •Suppliers. •Domestic¹⁵ •Geographic location 	<ul style="list-style-type: none"> •Provider: Networks •Reporting: Monthly. 	•All data.	<p>Enhanced current indicator.</p> <p>New elements: number not successfully installed & reasons.</p>
PAYG customers reverting to Credit	<ul style="list-style-type: none"> •Number of PAYG customers reverting from PAYG to credit meter. 	<ul style="list-style-type: none"> •Electricity & Gas. •Suppliers. •Domestic PAYG – including lifestyle choice & financial hardship. 	<ul style="list-style-type: none"> •Provider: Networks •Reporting: Monthly. 	•All data, except supplier detail.	New.

Table 5 Disconnections and PAYG Meters

2.3.6 Debt flagging

Consultation Proposals

Debt flagging sees a flag being raised where a customer that requests to switch supplier has a debt above a certain amount. This feature is applicable to all but the largest customers¹⁶. The debt flagging process which sees the new supplier being able to choose to cancel or proceed with a switch on receipt of a debt flag does not apply where there is a change of legal entity (CoLE).

¹³ Includes both financial hardship and lifestyle choice meters in gas. It will be important to distinguish between the two types.

¹⁴ Admin error (supplier/network), customer not present, customer refusal, no access, no appointment made, apartment, unsuitable meter location.

¹⁵ DG1-1, DG1-2, DG2-1 and DG2-2 breakdown in electricity.

¹⁶ Revised thresholds for the debt flagging process are outlined in the CER's information paper [CER/13/135](#) Debt Flagging Review June 2013.

The 2013 consultation paper suggested the collection of data from networks on the number of debt flags raised, debt flagged change of supplier (CoS) requests cancelled and accepted on a quarterly basis by supplier and all relevant customer categories.

Further detail on the requirements included in the consultation papers are in annex 1

CER's Decision

The CER welcomes the general support for the debt flagging indicator and notes that currently data is received monthly from both networks. The CER considers it important to continually monitor the effectiveness of the debt flagging process and requires data to do such. The CER has decided to maintain the indicators as set out in the 2013 consultation paper.

The CER would note that it requires data on all customer categories (including FVT in gas) as per the table below.

Decision 9

The CER will require Networks to submit data on debt flagging on a quarterly basis as per the table below. Any changes required to current reporting will be required to be implemented as soon as possible after the publication of this report.

The following table outlines the data to be submitted by networks in relation to debt flagging.

Indicator	Unit	Categories	Reporting & Provider	Publication	New/ current
Debt Flags raised	<ul style="list-style-type: none">•Number of debt flags raised.•Proportion of total CoS requests for the period.	<ul style="list-style-type: none">•Electricity & Gas.•Suppliers (losing).•All Customer Categories: domestic, PAYG, small business/IC & medium business/ FVT.	<p>Provider: Networks.</p> <p>Reporting: quarterly (with monthly breakdown)</p>	All data, except supplier detail.	<p>Enhanced current indicator.</p> <p>New element: proportion of CoS requests; FVT in gas.</p> <p>Reporting frequency changed from current monthly to quarterly reporting.</p>

Indicator	Unit	Categories	Reporting & Provider	Publication	New/ current
Debt Flagged Change of Supplier requests cancelled & accepted	<ul style="list-style-type: none"> •Number of requests received. •Number accepted •Number cancelled. 	<ul style="list-style-type: none"> •Electricity & Gas. •Suppliers (gaining). •All Customer Categories: domestic, PAYG, small business/IC & medium business/ FVT. 	Provider: Networks. Reporting: quarterly (with monthly breakdown)	All data, except supplier detail.	Enhanced current indicator. New element: FVT in gas. Reporting frequency changed from current monthly to quarterly reporting.

Table 6 Debt Flagging

2.4 Market Structures

This section includes a set of indicators that show the configuration or features of the market that drive market outcomes.

2.4.1 Market Share and Active Suppliers

Consultation Proposals

Market share data provides information on the size of the electricity and gas markets by market segment, in terms of customer numbers and consumption, or the share that each supplier has within each market segment. The trend in market share is a factor that has been considered in the decision to deregulate electricity and gas markets¹⁷. It is of paramount importance that CER continues to monitor market share across all market segments to ensure the effectiveness of competition and the options available to certain categories of customers.

The indicator on active suppliers measures the number of suppliers that are active in a market (i.e. that are actively seeking domestic or business customers). This indicator allows suppliers to state which market segments they are active in, regardless of the number of customers that they have. This would also enhance the awareness of other stakeholders of the number of suppliers active in each market and indicates the level of market development.

The consultation document suggested the continued reporting of customer numbers and consumption by supplier and customer segment on a monthly basis, with 'vulnerable customers' as a separate sub-segment in the domestic market. The paper also proposed the collection of quarterly information from

¹⁷ One condition in relation to deregulation was a threshold in terms of market share (defined in terms of consumption or customer numbers depending on market).

suppliers on whether or not they are active in particular segments of the gas and electricity markets.

Further detail on the requirements included in the consultation papers are in annex 1

CER's Decision

The CER welcomes the support for the market share and active supplier indicators. The CER has decided to maintain the indicators set out in the consultation.

With regard to vulnerable customers, the CER wishes to clarify that this relates to registered vulnerable customers. A vulnerable customer is defined in legislation and the Supplier Handbook as a household that is:

- critically dependent on electrically powered equipment, which shall include but is not limited to life protecting devices, assistive technologies to support independent living and medical equipment, or,
- particularly vulnerable to disconnection during winter months for reasons of advanced age or physical, sensory, intellectual or mental health.

The CER is requesting data on market share for all customer categories. Data for vulnerable customers and PAYG should form subsets of the 'domestic' category.

Decision 10

The CER requires that Networks submit data on market share as per the table below.

Suppliers will required to submit information on the markets that they are active in as per the below.

The following table outlines the data to be submitted by networks and suppliers in relation to the market share indicator.

Indicator	Unit	Categories	Reporting & Provider	Publication	New/ current
Market Share	•Customer numbers. •Consumption	•Electricity & Gas. •Suppliers. •All customer categories: domestic (vulnerable customers and PAYG to be reported as subsets of domestic) ¹⁸ , Small/IC, medium business/FVT & LEU/RTF. •Eurostat bands.	•Provider: Networks. •Reporting: monthly. Customer numbers & consumption based on Eurostat bands annually.	•All data.	Enhanced current indicator. New element: vulnerable customers.

¹⁸ DG 1-1, DG 1-2, DG 2-1 and DG 2-2 breakdown in electricity. DG breakdown for all other categories. Vulnerable to be incorporated in share report as a subset of the domestic category. The breakdown by type of vulnerability should also be provided.

Indicator	Unit	Categories	Reporting & Provider	Publication	New/ current
Active Suppliers	•Yes/No.	•Electricity & Gas. •All customer categories: domestic, PAYG (lifestyle choice), Small/IC, medium business/FVT & LEU/RTF.	•Provider: suppliers. •Reporting: quarterly (with a monthly breakdown).	•All data.	New.

Table 7 Market Share & Active Suppliers

2.5 Retail Market Outcomes

ERGEG defines retail market outcome indicators as those which intend to capture the key elements of customers' experience, i.e. the prices and choices in the market. Retail market outcomes can also help in identifying whether or not open and/or deregulated markets are delivering for customers.

2.5.1 End-User Prices, Diversity of Tariffs & Contracts and Price Spread

Consultation Proposals

The 2013 consultation suggested the collection of information on the diversity of tariffs that domestic and small business customers can avail of and the tariffs that customers are on (including the number of customers availing of each tariff or contract and the consumption). This is a measure of the options available to customers, the choices customers are making and, alongside other indicators, is a key indicator of competition. A number of other units of measure (e.g. security deposit, penalty clauses, legacy tariffs) were suggested as part of this indicator. Sub-elements of this indicator were the description of the tariff, the number of customers on the tariff (separating vulnerable customers), demand, the rates charged (variable & fixed) and the payment method used for electricity, gas and dual fuel market segments for the domestic and small business categories.

Related to this, the CER suggested the calculation of the price spread. Price spread measures the gap between the cheapest and most expensive tariffs available to customers and the potential savings that are available to customers.

The 2013 consultation paper also proposed the collection of data on end-user prices. It was proposed that end-user price is the average rate per customer category. This would be calculated using data submitted for all customer categories on revenues, customer numbers and consumption. The diversity of contracts, end-user price and price spread were suggested by ERGEG to be collected for domestic customers.

It was proposed that the price spread would be calculated by CER using data received from suppliers.

Further detail on the requirements included in the consultation papers are in annex 1

CER's Decision

The CER is of the view that data on the diversity of contracts, end user price and price spread are fundamentally important as indicators of competition and of the options available to customers. The CER considers it necessary to continuously monitor the level of customer engagement and the choices that customers make and can undertake such analysis with this information. Without such information, the CER cannot determine if customers are benefitting from the competitive markets that exist currently. The CER considers end prices should not be monitored in isolation and is of the view that it is necessary to analyse price component and contract information alongside price data to ensure that trends can be interpreted accurately. In addition the CER considers that the diversity of contracts indicator provides necessary qualitative information on plans and on the non-price related choices that customers are making.

The CER has decided to maintain the diversity of contracts and end-user price indicators in the 2013 consultation paper. Data for each market segment as indicated in the table below will be required.

The CER is of the view that customers on bespoke plans should not be reported individually. Therefore the CER considers that a separate sub segment should be introduced into the reporting of each market on 'bespoke plans'. This would report on the total number of customers on bespoke plans (i.e. individually tailored plans), the consumption associated with this group of customers and the *average* unit and standing charges.

The CER proposed that it calculates price spread using the data submitted by suppliers but that the supplier detail would not be published. To clarify, no additional data would be required from suppliers as part of this indicator.

The CER wishes to emphasise that no supplier will be identified or identifiable in its publication of data. The CER will only publish aggregated data for end-user prices and diversity of contracts (e.g. the number of plans available, the proportion of customers on standard plans, payment methods available, etc.). The CER notes that if there are concerns regarding the reporting of specific pieces of information, this can be put into a commentary section that is proposed to form part of submitted reports.

The CER would emphasise that presenting price comparison information in a form that is clear and easily accessible can potentially address the issues facing some inert customers. The Supplier Handbook provides guidance to suppliers in this respect. In addition, the CER has in place a price accreditation framework for price comparison websites. It is worth noting that since the consultation paper was published, the CER has accredited two price comparison websites¹⁹ and there is a process in place for the rollout of smart meters in both the electricity

¹⁹ Bonkers.ie and Uswitch.ie.

and gas markets. While some customers may choose to be inactive, the CER believes that informing the customer as to the savings that customers can make may encourage a greater level of customer engagement. The CER acknowledges that customers also see value in non-monetary aspects of their contract and considers that the Annual Consumer Survey also captures such information.

Decision 11

The CER requires that suppliers submit data on the diversity of contracts and end-user price as per the table below.

The following table outlines the detail to be submitted by suppliers as part of the diversity of contracts and end-user price indicators.

Indicator	Unit	Categories	Reporting & Provider	Publication	New/ current
Diversity of Contracts	<ul style="list-style-type: none"> •Tariff/ contract name. Description²⁰ •Customer Nrs •Consumption. •Actual Rates (unit charges, standing charges, services charges, etc). Average rates for the bespoke category. •Payment method used. •Security deposit required (yes/no). •Penalty clauses. •Legacy plan (yes/no & number of customers on such plans). •Annual average bill. 	<ul style="list-style-type: none"> •Electricity & Gas & Dual fuel plans & Bespoke plans. •Name of tariff offered (bespoke as a category). •Domestic (separate PAYG customers and vulnerable customers) & Small Business/IC. 	<ul style="list-style-type: none"> •Provider: Suppliers. •Reporting: quarterly (with monthly breakdown). 	General commentary, not supplier detail.	New.
End user price	<ul style="list-style-type: none"> •Customer numbers. •Consumption (MWhs). •Revenues. 	<ul style="list-style-type: none"> •Electricity & Gas. • Domestic ²¹ (separate PAYG customers), Small Business/IC, Medium business/FVT, LEU/RTF. 	<ul style="list-style-type: none"> •Provider: Suppliers. •Reporting: quarterly (with monthly breakdown). 	All data, except supplier detail.	New.

Table 8 Diversity of Contracts and End-User Prices

²⁰ Includes PAYG tariffs. Includes standing charge and unit rate and any additional benefits associated with the description of the Tariff.

²¹ DG 1-1, DG 1-2, DG 2-1 and DG 2-2 breakdown in domestic electricity, all business sub-segments.

2.5.2 Retail Margins

Consultation Proposals

Legislation stipulates that the CER is required to monitor final tariffs and whether the development and operation of competition is benefitting final customers. In addition, the CER is required to monitor the market in order to identify any distortion or restriction of competition. In the 2013 consultation document the CER set out the information requirements on margins and the components comprising final price. This was in the context of CER's remit with regard to maintaining effective sight of market activity to ensure that prices are fair and reasonable and that there is transparency in the market.

Retail margins of energy companies reflect the return on their investment and can be an indicator of the state of competition in various markets. The collection of data on retail margins is to be examined alongside other indicators to give a complete overview of competition in the market. It was considered in the consultation that the publication of data on retail margins (and the other components of end price) promotes competition by ensuring continuous competitive pressures on prices in the retail market. This will ensure an appropriate level of transparency in the market.

The CER has access to data on certain components that comprise final price; however it does not have additional information on some elements, such as supply costs or retail margins. In the consultation, the CER considered that the publication of retail margin data, even at aggregate level, would allow for comparison with the margins of companies in other jurisdictions and markets. Information on the retail margins is also of significant importance in ensuring that the prices charged are fair and that customers are protected and benefiting from competition (in line with the CER's legislative duties).

The consultation document proposed the collection of data from suppliers on an annual basis on a number of indicators on the retail activity of suppliers including: revenues, generation (broken into a number of different sub elements), transmission use of system charges (TUoS), distribution use of system charges (DUoS), public service obligation levy (PSO)/carbon tax, supply costs, suppliers depreciation and amortisation (D&A), supply margin (earnings before interest and tax) and VAT. The proposal suggested to breakdown each component into three segments: domestic, domestic PAYG and non-domestic (all business segments combined). The CER proposed to publish aggregate data for each customer category and not the supplier level detail.

Further detail on the requirements included in the consultation papers are in annex 1

CER's Decision

The CER has considered carefully the comments from respondents and has reduced the level of detail associated with the indicator. The units of measure will

be: revenue, total energy costs, network and other non-supply costs, supply costs and supply margin.

With regard to the customer categories, given the difficulties raised in the responses regarding the allocation of the data into domestic and non-domestic categories, the CER will require total data (total all customer categories) for most units, except the 'energy/wholesale costs', 'supply costs' and 'supply margin' units where the domestic and non-domestic breakdown will be required.

In relation to publication, the CER has decided not to publish margins information.

While data reports will be submitted by suppliers on an annual basis (i.e. in January following the report year), the CER would request that an initial report on 2013 data be submitted to it as indicated in the implementation section so that any reporting issues can be identified. As discussed in the implementation section, the CER will be meeting with suppliers individually, the format for receiving the data and the time frames for receipt for data.

While this decision contains a breakdown for reporting on the retail margins indicator, this breakdown will be reviewed on an ongoing basis (as will be the case for all indicators). Any alterations to the reporting structure will be communicated with all stakeholders as appropriate.

The CER would like to highlight again that no indicator in this market monitoring framework will be analysed in isolation. The CER would also highlight that it does not consider it appropriate to wait until there is a perceived evidence of anti-competitive behaviour in the market before collecting this information. By collecting and assessing information on retail margins and on the other components of price, along with other indicators, the CER is better able to monitor to identify any restrictions or distortions to competition in the market, as required in legislation. The data will provide richer information than is already held as to the cost base of suppliers, which ultimately influences end prices. In this regard, it should be noted that price is a key market outcome for customers, who rank it highest in their reasons to switch²². This highlights the importance of collecting data not only on margins but also the other costs components. The following is a summary of the key reasons for collecting data on retail margins:

- The objective of the indicator is to inform the CER as to how competition is developing through the analysis of the components that comprise end-user price and the aggregate retail margin.
- It is the responsibility of CER to monitor end-user prices. This can involve both the level and trend in end prices which involves the analysis of the components comprising end prices.
- The CER must maintain effective sight of market activity to ensure that prices are fair and reasonable and that there is transparency in the market.

²² CER Consumer Survey 2014.

- The CER is required to monitor to ensure that customers are benefitting from competition. In deregulated markets, there is a requirement for more enhanced ongoing monitoring of the development of competition to ensure that customers are benefitting.
- The CER considers that it is important not to monitor any indicator in isolation and the CER will assess margin information alongside other indicators, such as end-user price and the more qualitative indicator of diversity of contracts, as part of the process of examining if competition is benefitting customers.

Decision 12

The CER will require data on retail margins as outlined in the table below. The indicator is at a broader level than in the consultation document.

The following table outlines the detail to be submitted by suppliers in relation to the retail margins indicator.

Indicator	Unit	Categories	Reporting & provider	Publication	New/ current
Revenues	€ 000	•Gas & electricity. •Total.	Provider: Suppliers. Reporting: annual.	Not published.	New.
Energy/wholesale costs	€ 000	•Gas & electricity. •Domestic. •Non-domestic.	Provider: Suppliers. Reporting: annual.	Not published.	
Network & other non-supply or energy costs	€ 000	•Gas & electricity. •Total.	Provider: Suppliers. Reporting: annual.	Not published.	
Supply costs (excluding depreciation & amortization)	€ 000	•Gas & electricity. •Domestic ²³ (separate out PAYG). •Non-domestic.	Provider: Suppliers. Reporting: annual.	Not published.	
Supply margin (earnings before interest & tax)	€ 000	•Gas & electricity. •Domestic (separate out PAYG). •Non-domestic.	Provider: Suppliers. Reporting: annual.	Not published.	

Table 9 Retail Margins

²³ DG1-1, DG1-2, DG2-1 and DG2-2 breakdown in electricity.

2.5.3 Arrears and Payment Plans

Consultation Proposals

The number of customers in arrears is an important indicator in the context of market monitoring. Data on arrears shows the number of customers facing difficulty in paying their bills and will be used to inform customer protection policy. Data on the number of customers in arrears will provide information on the likelihood of a change in the demand for PAYG meters, number of payment plans and disconnections, and will be an indicator of the effectiveness of the initiatives in place to support customers in difficulty.

The consultation paper proposed collecting data on a quarterly basis (broken down by month) from suppliers on the number of customers in arrears, the total value of the arrears, the number of customers on payment plans and the number of broken payment plans. The CER proposed to publish at an aggregate level and not to publish the supplier detail.

Further detail on the requirements included in the consultation papers are in annex 1

CER's Decision

The CER has decided to maintain the arrears indicator as proposed in the consultation paper. The CER has reviewed the breakdown of the payment plans indicator in light of a SVP suggestion and has added in a number of additional measures to the payment plans indicator (including the average weekly repayments, spread of weekly repayments and number of payment plans broken before disconnection). The CER has also broadened out the breakdown of the domestic market in electricity to include different DG groups.

The CER wishes to clarify that data on arrears will not be published at supplier level but at an aggregate level. The CER will consider the necessity of publication when the first data reports are submitted. While in this decision the CER is broadening out the breakdown of the domestic electricity category to include the urban, rural, day-night and 24 hour meter breakdown (after consideration of an earlier SVP comment), the CER commits to publishing data on the domestic category at a broad level without the separation of PAYG, urban/rural or day-night/ 24hour customers.

While a breakdown on the amount of arrears is not included (only the total per segment), the CER suggests that suppliers collate such information internally and that ad hoc requests may be required in the future in this area to inform customer protection policy.

While legislation does not specifically require data on 'arrears', legislation states that the CER's market monitoring activity is not limited to the areas identified. The CER can collect other market monitoring data that it considers to be important in order to determine if customers are benefitting from competition and to identify

any distortion or restriction to competition and more generally that customers are protected. The CER considers that information on arrears and payment plans can help in informing customer protection policy and together with the indicator on disconnections (and PAYG meter installs) gives a clearer picture of the number of customers facing difficulty. The number of customers in arrears and with bad debt can also impact on the tariffs suppliers offer, requiring larger deposits and possibly having an impact on all tariff rates. Information on arrears and payment plans is vital to inform customer protection policy. The CER considers that the detail proposed as part of the indicator is at a relatively broad level and as such would not present a burden in relation to reporting.

Decision 13

The CER will require data on arrears and payment plans as outlined in the table below.

The following table outlines the detail to be submitted by suppliers as part of the arrear and payment plans indicators.

Indicator	Unit	Categories	Reporting & Provider	Publication	New/ current
Payment plans	<ul style="list-style-type: none"> •Number of customers on payment plans. •Number of payment plans successfully completed. •Number of broken payment plans. •Value of average weekly repayment (measured by specifying the highest & lowest rates). •Spread of weekly repayments. •Average number of broken payment plans per customer before disconnection. 	<ul style="list-style-type: none"> •Electricity & Gas. •Domestic. 	Provider: Suppliers. Reporting: quarterly (with monthly breakdown).	Aggregate, not supplier detail.	New.
Arrears	<ul style="list-style-type: none"> •Customer Nrs. •Total Value (€000). 	<ul style="list-style-type: none"> •Electricity & Gas •Debt days²⁴ •All customer categories: domestic²⁵, PAYG, small business, medium & large business. 	Provider: Suppliers. Reporting: quarterly (with monthly breakdown).	Aggregate, not supplier detail.	New.

Table 10 Arrears and Payment Plans

²⁴ The number of day's customer is in debt: <30 days, < 60 days, < 90 days, > 90 days.

²⁵ DG 1-1, DG 1-2, DG 2-1 and DG 2-2 breakdown in domestic electricity.

2.5.4 Contract Breakage Penalties

Consultation Proposals

Contract breakage penalties relate to the penalties that are applied to customers that exit from a contract before a specified duration. It may indicate whether or not customers are fully aware of all the terms and conditions associated with contracts. If a large number of customers are affected by penalties, this could also indicate that there are better deals available, even after a penalty has been applied. It was considered that such information is necessary in ensuring that there are no issues relating to customer awareness and to support the CER in its customer protection duty.

The consultation paper proposed the collection of annual data from suppliers (with a monthly breakdown) on the number of customer that incurred penalties in each customer category. It was proposed that data would be published at an aggregate level and not with the supplier detail.

Further detail on the requirements included in the consultation papers are in Annex 1

CER's Decision

While recognising the usefulness of information on contract breakage penalties, the CER has decided to collect such data on an ad hoc basis. The CER's Consumer Survey will assist in monitoring if customers are aware of penalty charges. Suppliers will not be required to submit such data on a regular basis.

Decision 14

The CER will not require suppliers to submit data on contract breakage penalties.

2.6 Customer Satisfaction

Customer satisfaction relates to the experience of customers in the energy market. The level of customer satisfaction is a key indicator in trying to assess whether competition is delivering not only cost benefits, but improved service and quality. The indicators proposed in this section help build a picture of the level of customer satisfaction.

2.6.1 Customer Complaints

Consultation Proposals

The monitoring of customer complaints is specifically required in legislation. Complaints measure the level of satisfaction of customers in the market. It is defined by ERGEG as the expression of a customer's dissatisfaction and that every complaint regardless of form (letter, email, phone call or in person) should be taken into account.

The 2013 consultation paper proposed the collection of quarterly data (with a monthly breakdown) from suppliers and networks on the number of customer complaints by complaint category for all customer categories.

Further detail on the requirements included in the consultation papers are in Annex 1

CER's Decision

The CER has decided to maintain the complaints indicator but has altered the complaints categories based on respondents suggestions and has changed the frequency of data inputs to annual.

The CER considers that data on complaints from supplier companies is of value and would allow for a more robust analysis of the level of customer satisfaction. The CER in its consultation paper had cut back significantly on the level of detail proposed as part of this indicator and considers it imperative that it monitors complaints from all customer categories to gauge satisfaction across all customer types. The CER would consider that some systems are already in place to address formal complaints and that this can be extended to achieve the necessary reporting detail. The CER would note that it already collects some data on complaints through its Consumer Survey and the proposed data would complement the data that is gathered through this Survey, and also the monitoring of complaints received by the CER's Energy Customer Team (both of which will continue to be produced).

Decision 15

The CER will require Networks and suppliers to submit data on complaints as per the table below.

The following table outlines the detail that suppliers and networks will be required to submit as part of the customer complaints indicator. The definition of each sub-category will be considered as part of implementation.

Indicator	Unit	Categories	Reporting & Provider	Publication	New/current
Customer Complaints	Number of complaints.	<ul style="list-style-type: none"> •Complaint Categories (see below). •Electricity & Gas. •All customer categories: domestic²⁶, PAYG, Small/IC, medium/FVT & large business/RTF. 	Provider: <ul style="list-style-type: none"> •Suppliers. •Networks. Reporting: annual (with quarterly breakdown).	All.	New.

Table 11 Customer Complaints

Complaint categories:

Network Categories	Supplier categories
Estimated Meter Readings	Billing Issue
Customer Service Issues	Payments (i.e. Charges, direct debit, price, refunds, deposits)
Safety Complaints	Meter Issues
Meter Issues	Customer Service Issues
Quality of supply/interruption to supply	Marketing Issues
Siteworks Charges	Sales Issues
Other Issues	Account Issues
	Switching Issues
	Prepayment Meter Issues
	Credit Management Issues
	Other Issues

2.6.2 Customer Enquiries

Consultation Proposals

An enquiry is described as a request for information or advice. The collection of information on customer enquiries is identified as an important area for monitoring in the ERGEG guidelines. Coupled with other indicators, enquiries can identify if there might be issues relating to market processes for customers that require further investigation.

²⁶ DG 1-1, DG 1-2, DG 2-1 and DG 2-2 breakdown in domestic electricity.

The consultation proposed the collection of quarterly data (with a monthly breakdown) from suppliers on the total number of enquiries for all customer categories.

Further detail on the requirements included in the consultation papers are in annex 1

CER's Decision

Given the issues raised in the responses to the 2013 consultation regarding reporting, the CER has decided not to collect data on enquiries.

Decision 16

The CER will not require suppliers to submit data on enquiries.

2.7 Other Proposals

Consultation Proposals

In the first consultation paper in 2011, the CER outlined a number of other potential areas for market monitoring (barriers to entry, wholesale market liquidity, and innovation) and requested feedback from respondents as to the value in reporting these. The 2013 consultation proposed that the CER will not actively monitor the additional areas of market monitoring.

The CER considers these as important but suggested it was not necessary to monitor them specifically and that analysis would be undertaken on an ad hoc basis.

Further detail on the requirements included in the consultation papers are in Annex 1

CER's Decision

The CER considers that, while these measures are of interest, it is minded not to monitor them specifically. With regard to the 'wholesale market liquidity' indicator, this is already monitored on an ongoing basis by the CER and therefore the analysis of wholesale market liquidity as part of the retail market monitoring framework is not required.

2.8 Reporting

2.8.1 De Minimis threshold for Suppliers

Consultation Proposals

The 2013 consultation document proposed a de minimis threshold for reporting so that small suppliers are not disproportionately affected by the new data requirements and that no customer is identifiable. CER suggested exempting suppliers with market shares of less than 1% of consumption or 4 customers (large customers) in electricity and 1% of customers in gas, with the exception of the customer satisfaction indicators (customer complaints and enquiries). It was proposed that the CER would not report on data for suppliers with market shares of less than the threshold and that such data would be included in an 'others' category.

CER's Decision

The CER has decided maintain the de-minimis threshold as proposed in the consultation.

The threshold will apply for reporting on all indicators with the exception of the customer satisfaction indicators (customer complaints, enquiries, and the customer charter and codes of practice). All suppliers with market shares of less than the thresholds in particular market segments will not be required to report on the indicators identified in the retail market monitoring framework, with the exception of the customer satisfaction indicators.

Decision 17

De minimis thresholds of 1% of consumption or 4 customers in electricity and 1% of customers in gas will be introduced. Suppliers with market share of less than the threshold will not be required to submit monitoring data to the CER with the exception of market satisfaction indicators and Codes of Practice reporting, until the threshold is reached.

The CER will not report data for suppliers with market shares of less than the threshold for any indicator. Data for these suppliers will be included in an 'others' category for the indicators that the CER has data for such suppliers.

2.8.2 Customer Charter and Codes of Practice Reporting

The consultation document stated that suppliers will be required to submit an annual report setting out their compliance with the CER's Natural Gas and Electricity Supplier's Handbook as required by licence. The Natural Gas and Electricity Supplier's Handbook sets out the CER's requirements for suppliers in the areas of customer charters, marketing and sign up, billing, disconnection,

PAYG, complaints handling, vulnerable customers and terms and conditions of supply to household customers.

The detail that must be contained in the report remains as follows:

1. Details of how customers are made aware of the existence of the supplier's Codes of Practice and Customer Charter.
2. A short statement setting out how the supplier is meeting the CER's guidelines in relation to Codes of Practice and the Customer Charter.
3. Details on internal systems designed and implemented to ensure that Vulnerable Customers are registered and are on the most economic tariff available for their chosen method of payment.
4. Details of the supplier's services that have met the requirements of universal design.
5. Details of any initiatives taken to reduce the number of customer disconnections.
6. Details of any measures taken to assist customers with budgeting for their energy use (excluding individually negotiated measures).

Audits on the compliance with the codes of practice will continue to be required and as has been the case to date, the CER will notify suppliers of when such audits will take place. This qualitative data will contribute to the CER's market monitoring.

The CER will discuss the requirements for this indicator, as part of the implementation process and where required, issue guidance to suppliers regarding the reporting requirements for this indicator.

3.0 Format and Implementation of New Market Monitoring Framework

3.1 Introduction

This report has outlined the CERs decision on the frame work and indicators it will collect from networks and suppliers to form a new market monitoring framework. The following section outlines a proposed process for implementation. To provide context, the section also identifies hypothetical timelines for the submission of data reports. The CER would note that it intends to meet with suppliers (individually) and both networks companies (individually) regarding implementation time lines and process after the publication of this decision.

3.2 Indicative Timeline for Implementation

The CER has set out all the indicators that will be submitted by networks and suppliers on an ongoing basis. The table under each proposed decision identifies the measurement unit, the other pieces of information that are sought as part of the proposed indicator (e.g. customer numbers) and the breakdown that is required (i.e. which market segments/customer categories). The tables also identify the frequency of reporting, that is the maximum regularity that data inputs may be required to be submitted to the CER (i.e. monthly, quarterly or annually) and the period which the submitted data must cover (i.e. month, quarter or annual). In some instances, the frequency will vary from the reported period.

The CER has drafted an indicative implementation timeline for the submission of data (below). *The CER would emphasise that this this timeline is indicative only and will finalise a timeline after discussions with suppliers and networks.* The CER intends on taking a phased approach in relation to implementation, where some indicators may be required to be submitted shortly after the publication of the decision and others at a later date (to take account of implementation considerations). The CER acknowledges that implementation is dependent on suppliers and networks ability to introduce any necessary system and process changes, and in turn for CER to have developed the necessary internal systems and processes, to enable CER to commence its analysis. The CER is of the view that the detail is at a level that the frame work can be successfully implemented. The general responses for each indicator were taken into account when developing the frequency of data submissions and the indicative timeline for implementation. The identified frequency for the reporting of data inputs is the maximum frequency at which the CER will collect data on each indicator, and

may review these frequencies through the implementation process and the associated interaction with stakeholders.

In the following tables, the month highlighted is an example start date from which data may be submitted *in the new format*. It would be proposed that all current reports will continue to be submitted until the date when new reports are developed. The CER notes that this timeline is an example only and will discuss timelines with suppliers and networks after the publication of this decision.

The notes below the tables highlight some other matters regarding the reporting of specific indicators. It is envisaged that data will be required to be submitted before a specific day in the reporting month as suggested as follows:

- Monthly data (mtly) to be submitted on or before the 20th day of the following month
- Quarterly data (qtly) to be submitted on or before the 20th day in the month after the end of the calendar quarter (i.e. quarter 1 refers to January, February and March, quarter 2 refers to April, May and June, etc.).
- Annual data (AL) to be submitted on or before the 20th day of January of the following year.

Network Indicator New Reports	2014				2015												2016
	Jul- Oct	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec	Jan
Switching requests & completed *	Current Reporting to continue							Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly
Repeat Switching ‡					AL												AL
Failed & delayed switching					AL												AL
New registrations	Current Reporting to continue																AL
NPA Disconnections**	Current Reporting to continue				Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly
Incomplete NPA Disconnections					Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly
Time to reconnect								Qtly			Qtly			Qtly			Qtly
Vacant Premises disconnected	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly
PAYG for financial hardship	Current Reporting to continue				Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly
PAYG reverting to credit					Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly
Debt Flagged CoS raised, cancelled & accepted *	Current Reporting to continue							Qtly			Qtly			Qtly			Qtly
Market Share	Current Reporting to continue	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly
Market Share - Eurostat					AL												AL
Customer complaints†																	AL

Table 12 Proposed Timeline for Implementation – New Network Indicators Reports

*System and schema changes will be required by BGN. System changes to allow for the reporting of CoLE will be required to be introduced before April 2015 and as such current reporting will continue until CoLE can be reported by BGN. BGN will be required to report on the FVT and RTF market segments as part of the switching and debt flagging data from April 2015. New ESNB reports should also be required to be developed before April 2015.

**System changes to allow for the reporting of NPA-specific disconnections will be required to be introduced before January 2015 and as such current reporting will continue until NPA-specific data.

†Complaints will be required annually and the first report will cover complaints in 2015. This report will be required to be submitted in January 2016.

‡System changes will be required by BGN to exclude CoLE from this data. As such, system changes must be updated by January 2015 and the first data report including CoLE data from BGN will be submitted in January 2016 covering the full year 2015.

Supplier Indicator New Reports	2014			2015												2016
	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec	Jan
Dual fuel switching				Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly
Active Suppliers					AL (2014)											AL (2015)
Retail Margins		AL (2013)			AL (2014)											AL (2015)
Renegotiations							Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly	Mtly
Defaulting to standard																AL
Diversity of Contracts				Qrtly (Q4)			Qrtly (Q1)			Qrtly (Q2)			Qrtly (Q3)			Qrtly (Q4)
End-user price				Qrtly (Q4)			Qrtly (Q1)			Qrtly (Q2)			Qrtly (Q3)			Qrtly (Q4)
Arrears							Qrtly (Q1)			Qrtly (Q2)			Qrtly (Q3)			Qrtly (Q4)
Payment plans				Qrtly (Q4)			Qrtly (Q1)			Qrtly (Q2)			Qrtly (Q3)			Qrtly (Q4)
Customer Complaints*																AL
Code of Practice reporting†																

Table 13 Proposed Timeline for Implementation – Supplier Indicators

*Complaints will be required annually and the first report will cover complaints in 2015. This report will be required to be submitted in January 2016.

†After the publication of this Decision, the CER will develop a draft form and format for the Codes of Practice reporting and will issue guidance on such to suppliers when finalised.

3.3 Process for Implementation –Possible Considerations

While this report identifies the indicators that will be submitted to CER on a regular basis as part of the new market monitoring framework, there are a number of implementation related factors that need to be considered, in particular relating to the reporting of indicators to CER. These factors are highlighted below. The CER will consider these after the publication of this decision and will discuss implementation matters with suppliers and networks as appropriate. The implementation time frame will take into consideration the time required by networks and suppliers (and the CER) to develop the required processes to implement the monitoring framework and balance this with the need to continue and improve the effective monitoring of the retail market.

Consistency in reporting format/structure and time of reporting to CER.

The CER requires consistency in the format of the reports submitted by various stakeholders. While the CER has developed reporting forms for suppliers to ensure consistency, a similar form has not been developed for Networks (however detail on the headings required for data reports is provided in the appendix). The CER currently receives a significant amount of data from networks but this data is submitted in a different format by both networks and in some instances with different reporting frequency. The CER requires consistency in these submissions and has proposed timelines for the submission of data. With regard to the structure of inputs, the CER will consider how such can be improved to ensure consistency.

The CER requests that all stakeholders submit data on time. In the event of an exceptional circumstance, a report will not be submitted by a certain date, the CER must be receive a request for extension in advance and must be provided with an alternative date for submission.

- *Description of the data in each report & reasons for trends*

The CER is cognisant of the differences in the measurement and collation of data related to the same variables between networks, and possibly between suppliers. To ensure that there is a record of methodologies being used and in particular if there is a change in methodology, the CER suggests that all reports contain a brief description of what exactly is contained in the report and how the indicator is measured (including the number of and the names of the fields in the issuing/return market messages that are involved in the transaction if applicable). This is not a description of the trends in the data, but background information on the contents of the report which should be the same for all reports of particular indicators but may change over time as processes/methodologies change.

Besides where specifically requested in the monitoring framework, suppliers may also, at their discretion, submit reasons for particular trends or things that

may have an impact on trends in certain indicators. The CER will continue to request such information from suppliers on an adhoc basis.

- *One central CER data email address*
The CER will develop a new email address where all data reports must be submitted. This email will not change over time and all staff in the CER Retail Markets team will have access to the generic email address. The CER will inform stakeholders when there is a change to the staff that have access to the email.
The CER will in due course notify all stakeholders of what the email address will be and when it will take effect.
- *Security*
Suppliers and networks may be required to add passwords to the data that is submitted. Such passwords can take a generic form or suppliers may wish to email the passwords to CER separately. All data that is received from stakeholders is stored on the CERs internal data management system, TRIM. The CER will inform stakeholders of any changes to security systems in CER.
- *Data portal*
The CER will consider the merits of creating a web portal accessible to stakeholders to submit data reports through its website. The CER will review the necessity and practicality of such after this decision is published.
- *Review of required data*
The CER will undertake ongoing reviews of the indicators that are required as part of market monitoring. The CER may from time to time, propose alterations to the collected indicators, the level of detail collected and the frequency of data inputs. The CER may also propose new indicators to be collected. This is to account for any potential changing market conditions that necessitate the collection of additional variables or reduce the necessity for the collection of certain indicators. The CER will notify all relevant stakeholders in advance of any proposed changes.
- *Ad hoc requests*
The CER would like to note that this decision outlines the set pieces of data that will be required from suppliers/networks on an on-going basis. The CER cannot account for adhoc requests which may arise from time to time and acknowledges that these will continue.

3.4 Compliance with Monitoring Requirements

The CER's power to request information from licensed suppliers and network operators in both electricity and gas are clearly set out in the Electricity Regulations Act 1999 and the Gas (interim) Regulation Act 2002 respectively, and is also identified in supplier licences. Suppliers are required to comply with

any requests for information by CER as per their licence. Any non-compliance with the requests contained in this decision result in that supplier being in breach of its supply licence and as such will be actioned on as necessary by CER, as set out in sections 24 and 25 of the Electricity Regulation Act 1999.

To date the CER has not regularly received data from suppliers and such data was requested on an ad hoc basis. This decision identifies the range of indicators that will be submitted by suppliers on an ongoing basis. This decision represents a marked improvement in terms of monitoring to ensure the effective oversight of the retail market as required by legislation.

The CER does not consider that there will be difficulties regarding implementation but where issues may arise, the CER will discuss the difficulty with Suppliers and Networks. The data is to be used to assess the development of competition and the benefit to the final customer. The CER is confident that suppliers and networks will submit the necessary data to ensure the development of a more enhanced retail monitoring environment in Ireland.

3.5 Timeline for New CER Market Monitoring Reports

The following outlines the timeline for the reporting of the new market monitoring indicators by the CER. Any additions/deletions to these reports are identified in the note column. To note, while this refers to the publication details of each indicator as relevant, the CER undertakes internal reporting on an ongoing basis. Internal reporting of all indicators will continue as data is received from suppliers and networks. The CER will consider the necessity of producing alternative reports after implementation.

Monitoring Report	Frequency	Date of next report	Note on Contents
Switching report	Monthly	August 2014	No change expected.
Domestic Disconnections Report	Monthly	August 2014	No change expected.
Quarterly Electricity and Gas Retail Market Review	Quarterly	October 2014 (for Q2 2014).	As data is received, content of report will be updated.
Annual Retail Market Report	Annual	June 2015	Annual report will contain all current variables with the addition of new indicators.
Internal reporting	The CER will continue to monitor and report on all variables internally on an ongoing basis.		
Annual Consumer Survey	This report does not draw on the data submitted by Networks/Suppliers. It is an important source of non-quantitative market information and feedback direct from consumers.		

Table 14 Timeline for CER Reports

4.0 Conclusions and Next Steps

This paper sets out the CER's decision with regard to the indicators that will form part of a new market monitoring framework. These proposed indicators take account of the responses to the 2013 consultation. All responses are published alongside this report. The CER would note that it may alter indicators or seek additional information in the future if required.

The CER is committed to the effective monitoring of the retail market, with a view to protect consumers and promote competition. The CER will meet with and liaise with stakeholders to finalise timeframes and formats of reports prior to data reports being submitted.

Annex 1 Consultation Proposals

Consultation Proposal 1-3: Market Segmentation

The 2013 consultation paper proposed to retain the current methodology of market segmentation in both electricity and gas, but with the addition of PAYG customers as a subset of the domestic category in both gas and electricity. Given the increase in the number of customers with PAYG meters²⁷ and the importance of such in assisting those in difficulty, the CER considered it important to distinguish these customers in the data.

The CER suggested that the continuation of the current segmentation will provide sufficient breakdown of data, while maintaining the ability to compare data to that collected from the CER's market monitoring activities to date. Continued analysis against historical data will assist the CER in identifying trends and in doing so provide greater insight as to how competition is developing. The use of the current segmentation would avoid potentially substantive system changes and reduces the administrative burden on the industry than alternative options²⁸.

The CER also proposed that network companies provide a breakdown of customer numbers and consumption annually in the Eurostat breakdown. SEAI submit to Eurostat (and publish) data on gas and electricity prices twice yearly using data which is required to be submitted by all suppliers. These data have become one of the main references for historical price movements in Ireland and for comparison with other European countries. The SEAI data is broken down into different consumption segments for domestic and industrial and commercial customers and is more detailed than that currently used by the CER. It was considered that such data will assist the CER in understanding the proportion of customers that are in each price category.

The CER also proposed a change to the naming of the market segments in gas.

The CER proposed the above options for comment in the 2013 consultation paper and also invited requests for alternative categories.

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.

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.

²⁷ PAYG refers to the meters that have been installed free of charge by ESBN and BGN for those in financial difficulty (but including the lifestyle choice meters in gas).

²⁸ As proposed in the 2011 consultation paper.

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.

Consultation Questions:

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 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 3 – Is the proposed naming convention 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.

Consultation Proposal 4: Switching

Monitoring of switching is explicitly required in legislation. Switching refers to the number of customers changing supplier in a given period. The switching rate is a key indicator of the level of customer engagement within the market, the ease of the switching process and the level of competition between suppliers in the marketplace. A high switching rate (which counts all switches in the period be they attributable to a customer that has switched multiple times in the period or just once) indicates a high level of customer engagement.

Repeat switching refers to a customer that switched multiple times in a period. It is important to know if customers switched once or more than once as it is reflective of the actual level of switching. If total switching is comprised primarily of customers that switched more than once, this may be indicative of a degree of customer inertia in the market.

When a switch is not completed (times out or is cancelled), this is considered a failed switch. Together with delayed switches, this indicator would provide information on whether the switching process is operating effectively for customers. A delayed switch is one which is completed outside of the recommended timeframe to complete a switch. The 3rd Package requires that switches requested by customers are completed within 3 weeks. The CER proposed that a delayed switch will occur when:

- A switch with a customer read – over 3 weeks of the MRSO/GPRO receiving the request from the supplier.
- A switch with a scheduled read – over 2 weeks of the scheduled read.

The 2013 consultation document proposed collecting monthly data on the switches requested and completed in both gas and electricity. The indicator on switches completed was to take account of the proportion that were also a change of legal entity (CoLE) and it was proposed that suppliers submit data on dual fuel switching. Data on repeat switching was proposed to be submitted by networks on an annual basis and delayed and failed switches on a quarterly basis.

Consultation Proposal 4

The CER proposed the switching indicators outlined in the table below.

Indicator	Unit	Categories	Provider	Reporting	Publication
Switches Requested	Number of requests.	<ul style="list-style-type: none"> •Electricity & Gas. •Supplier. •All customer categories: domestic, PAYG, small business, medium & large business. 	Networks.	Monthly.	All.
Switches completed	<ul style="list-style-type: none"> •Total Number of switches. •Gains/losses by supplier. •Proportion of total that were also a CoLE (only networks). 	<ul style="list-style-type: none"> •Electricity & Gas. •Supplier. •All customer categories: domestic, PAYG, small business, medium business & large business. 	<ul style="list-style-type: none"> •Networks. •Suppliers - dual fuel customers switching. 	Monthly.	All.
Repeat Switching Rate	Number of times customer has switched in a year based on GPRN/MPRN (excluding CoLE).	<ul style="list-style-type: none"> •Electricity & Gas. •All customer categories: domestic, PAYG, small business, medium & large business. 	Networks.	Annual (no requirement to provide monthly/quarterly breakdown)	All.
Delayed Switches	•Total number of delayed switches.	<ul style="list-style-type: none"> •Electricity & Gas. •Supplier. 	Networks.	Quarterly (monthly breakdown)	All, except supplier detail.

Indicator	Unit	Categories	Provider	Reporting	Publication
	•Number falling into each band.	<ul style="list-style-type: none"> •All customer categories: domestic, PAYG, small business, medium & large business. •Bands (2-3; 3-4; 5-6 Weeks etc). 		required).	
Failed Switches	Total number of failed switches.	<ul style="list-style-type: none"> •Electricity & Gas. •Suppliers. •All customer categories: domestic, PAYG, small business, medium & large business. 	Networks.	Quarterly (monthly breakdown required).	All, except supplier detail.

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?

Consultation Proposal 5: Renegotiations

The consultation document proposed the collection of data from suppliers on a monthly basis for renegotiations and quarterly for defaulting to standard tariffs in electricity and gas broken down by domestic, PAYG and small/IC business.

Consultation Proposal 5.

The CER is proposing that suppliers submit information on renegotiations, as outlined in the table below.

Indicator	Unit	Categories	Provider	Reporting	Publication
Renegotiations	<ul style="list-style-type: none"> •Number of renegotiated contracts. •Number of customers renegotiating. 	<ul style="list-style-type: none"> •Electricity & Gas. •Domestic, PAYG & Small business/IC. 	Suppliers.	Monthly.	All, except supplier detail.
Defaulting to Standard Tariffs	Number of customers defaulting to standard tariff.	<ul style="list-style-type: none"> •Electricity & Gas. •Domestic, PAYG & Small 	Suppliers.	Quarterly (with monthly breakdown).	All, except supplier detail.

business/IC.

Table 2 Renegotiations & Defaulting to Standard Tariffs

Consultation Question:

Question 5 - Respondents are invited to comment on the proposals outlined for measuring renegotiations. Is there any other methodology that could be used?

Consultation Proposal 6: New Connections

Connections refer to new sites registered and sites that are reconnected/reenergised. Connections of customers to the electricity and gas networks, respectively, are part of the customer's interaction and experience with the market and impact on the market share of suppliers.

The CER currently receives data from both Network companies on the number of new connections/registrations. The 2013 consultation paper proposed the continued collection of new connection data and the collection of data on the average time to connect and the range of times to connect across customer categories.

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.

Indicator	Unit	Categories	Provider	Reporting	Publication
New connection/registrations	.Number of new registrations. •Proportion that are reconnections.	•Supplier. •All customer categories: domestic, PAYG, small business, medium business & large business.	Networks.	Quarterly (with monthly breakdown).	All data.
Average time to Connect	Average number of days.	•All customer categories: domestic, PAYG, small business, medium business & large business.	Networks.	Annual (monthly/quarterly breakdown not require).	All data.
Range of times to Connect	Number of connections falling into each day range.	•All customer categories: domestic, PAYG, small business,	Networks.	Annual (monthly/quarterly breakdown not require).	All data.

		medium business & large business. •Times to connect: 0-10 days; 11-15 days; 16-20 days; 21-25 days; 26-30 days; and 30+ days.			
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Consultation Proposal 7: Repairs

Legislation states that the charges for and the execution of maintenance services are monitored. ERGEG supports the idea of defining quality of service obligations for repairs and the 3rd package requests that the time taken by networks to make repairs is monitored. This indicator is part of the measurement of quality of service experienced by customers and will identify instances of interruptions to customer supply.

Under the proposal in the 2013 consultation paper, it was proposed that networks submit the data on repairs in January or February of the following year. For electricity the measures include Customer Minutes Lost (CML) and Customer Interruptions (which measure the average time to complete repairs carried out by ESB Networks) and in gas the restoration of gas supply by the end of the following day after notification.

Consultation Proposal 7.

The CER is proposing to collect the following indicators in January /February of the following year:

- Electricity: Average Customer Minutes Lost (CML) & Customer Interruptions (CIs).
- Gas: Restoration of gas supply by the end of the following day following Notification.

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.

Consultation Proposal 8-9: NPA Disconnections

Legislation specifically states that disconnections are to be monitored. Disconnections refer to the act of interrupting the supply of electricity or gas to a site. Disconnections highlight the number of customers that have, among other

things, fallen into financial difficulty and have, despite customer protection measures already in place, had supply to their premise turned off. Currently the CER publishes data on disconnections for non-payment of account (NPA).

Suppliers are required to treat disconnections as a last resort and must provide customers with assistance to manage their bills (as stipulated in the Supplier Handbook²⁹). The CER already monitors disconnection levels to ensure that disconnections are minimised and to identify if additional safeguards / assistance are required. The CER publishes the data it collects per supplier. It is the CER's responsibility to ensure that customers are protected and that disconnections are a last resort. There are a number of measures in place to ensure disconnections of customers in difficulty are minimised and the CER must monitor the market to ensure that such measures are effective.

The consultation document proposed the collection of data on NPA specific disconnections, the time to reconnect, the self-disconnection of PAYG customers, the number PAYG customers for financial hardship and the number of PAYG customers reverting to credit mode. The CER proposed that data be submitted on the geographic location of both disconnected sites and sites with PAYG meters installed. Such information will assist the CER in determining if there are certain "hotspots" for disconnections/PAYG meters and will also help in ensuring that the allocation of network resources meets demand. With regard to self-disconnection, the CER considers it is important to monitor if such customers are still having difficulty even with a PAYG meter installed.

Consultation Proposal 8

The CER is proposing the indicators on NPA disconnections, time to reconnect and PAYG meters outlined in the table below

Consultation Proposal 9

The CER proposes to monitor the level of self-disconnection among PAYG customers.

Indicator	Unit	Categories	Provider	Reporting	Publication
NPA Disconnections	Number of customers disconnected (at GPRN/MPRN level).	•Electricity & Gas. •Suppliers (billed & current). •All customer categories: domestic, small business, medium business & large business. •Geographic location.	Networks	Monthly.	All data.
Time to Reconnect	Number of reconnected	•Electricity & Gas.	Networks	Quarterly.	All data.

²⁹ [CER12/081](#), Electricity and Natural Gas Supplier Handbook.

	sites by MPRN/ GPRN, excluding where there was a CoLE on reconnection	<ul style="list-style-type: none"> •Domestic customers. •Date of disconnection & reconnection •GPRN/ MPRN 			
Self-disconnection of PAYG customers	<ul style="list-style-type: none"> •Date of last vend. •Amount of last vend. •Consumption at site. •Sites in emergency credit. •Other? 	<ul style="list-style-type: none"> •Domestic PAYG (lifestyle choice & financial hardship). 	Networks/ suppliers.	Monthly.	All data, except supplier detail.
PAYG Meters for financial hardship	<ul style="list-style-type: none"> •Number of free PAYG meters installed³⁰. 	<ul style="list-style-type: none"> •Electricity & Gas •Suppliers. •Domestic •Geographic location 	Networks	Monthly.	All data.
PAYG customers reverting to Credit	<ul style="list-style-type: none"> •Number of PAYG customers reverting from PAYG to credit meter. 	<ul style="list-style-type: none"> •Electricity & Gas. •Suppliers. •Domestic PAYG – including lifestyle choice & financial hardship. 	Networks.	Monthly.	All data, not supplier detail.

Table 4 Disconnections, Vacant Premises Disconnected and PAYG Meters

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.

³⁰ Includes both financial hardship and lifestyle choice meters in gas. It will be important to distinguish between the two types.

Consultation Proposal 10: Debt Flagging

Consultation Proposal 10.

The CER is proposing the debt flagging indicators outlined in the table below.

Indicator	Unit	Categories	Provider	Reporting	Publication
Debt Flags raised	<ul style="list-style-type: none"> •Number of debt flags raised. •Proportion of total CoS requests for the period. 	<ul style="list-style-type: none"> •Electricity & Gas. •Suppliers (losing). •All Customer Categories: domestic, PAYG, small business & medium business. 	Networks.	Quarterly (with monthly breakdown).	All data, except supplier detail.
Debt Flagged Change of Supplier requests cancelled & accepted	<ul style="list-style-type: none"> •Number of requests received. •Number accepted •Number cancelled. 	<ul style="list-style-type: none"> •Electricity & Gas. •Suppliers (gaining). •All Customer Categories: domestic, PAYG, small business & medium business. 	Networks.	Quarterly (with monthly breakdown).	All data, except supplier detail.

Table 5 Debt Flagging and Change of Legal Entity

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.

Consultation Proposal 11-12: Market Share and Active Suppliers

Market share data provides information on the size of the electricity and gas markets by market segment, in terms of customer numbers and consumption, or the share that each supplier has within each market segment. The trend in market share has been a factor that has been considered in the decision to deregulate electricity and gas markets³¹. It is of paramount importance that CER continues to monitor market share across all market segments to ensure the effectiveness of competition and the options available to certain customers.

The indicator on active suppliers measures the number of suppliers that are active in a market (i.e. that are actively seeking domestic or business customers). This indicator allows suppliers to state which market segments they are active in,

³¹ One condition in relation to deregulation was a threshold in terms of market share, consumption or customer numbers depending on market.

regardless of the number of customers that they have. This would also enhance the awareness of other stakeholders of the number of suppliers active in each market and is an indicator of market development.

The consultation document suggested the continued reporting of customer numbers and consumption by supplier and customer segment on a monthly basis, and with 'vulnerable customers' as a separate sub-segment in the domestic market. The paper also proposed the collection of quarterly information from suppliers on whether or not they are active in particular segments of the gas and electricity markets.

Consultation Proposal 11 and 12.					
The CER is proposing the market share indicators outlined in the table below.					
Indicator	Unit	Categories	Provider	Reporting	Publication
Market Share	<ul style="list-style-type: none"> •Customer numbers. •Consumption 	<ul style="list-style-type: none"> •Electricity & Gas. •Suppliers. •All customer categories: domestic (vulnerable customers to be reported separately), Small, medium business & large business. •Eurostat bands. 	Networks.	<ul style="list-style-type: none"> •Monthly. •Customer numbers & consumption based on Eurostat bands annually. 	All data .
Active Suppliers	•Yes/No.	<ul style="list-style-type: none"> •Electricity & Gas. •All customer categories: domestic, PAYG (lifestyle choice), small, medium & large business. 	Suppliers.	Quarterly (with a monthly breakdown)	All data.

Table 6 Market Share & Active Suppliers

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.

Consultation Proposal 13-15: Diversity of Contracts, End-User Price and Price Spread

The 2013 consultation suggested the collection of information on the diversity of tariffs that domestic and small business customers can avail of and the tariffs that customers are on (including the number of customers availing of each tariff or contract and the consumption). This is a measure of the options available to customers, the choices customers are making and, alongside other indicators, is a key indicator of competition. A number of other units of measure (e.g. security deposit, penalty clauses, legacy tariffs) were suggested as part of this indicator.

Related to this, the CER suggested the calculation of the price spread. Price spread highlights the gap between the cheapest and most expensive tariffs available to customers and the potential savings that are available to customers.

The 2013 consultation paper also proposed the collection of data on end-user prices. It was proposed that end-user price is the average rate per customer category. This would be calculated using data submitted for all customer categories on revenues, customer numbers and consumption. The diversity of contracts, end-user price and price spread were suggested by ERGEG to be collected for domestic customers.

The consultation paper proposed collecting data from suppliers on a quarterly basis on the diversity of contracts and end-user prices. Sub-elements of this indicator were the description of the tariff, the number of customer numbers on the tariff (separating vulnerable customers), demand, the rates charged (variable & fixed) and the payment method used for electricity, gas and dual fuel market segments for the domestic and small business categories. End user price data was proposed to be collected for all categories. It was proposed that the price spread would be calculated by CER using data received from suppliers.

Consultation Proposal 13.

The CER is proposing the collection of data on the diversity of tariffs as described in the table below.

Consultation Proposal 14.

The CER is proposing the collection of data on end-user prices.

Consultation Proposal 15.

The CER is proposing to calculate the price spread between the most expensive and cheapest tariffs by supplier and across the market.

Indicator	Unit	Categories	Provider	Reporting	Publication
Diversity of Contracts	<ul style="list-style-type: none"> •Tariff/ contract name. Description •Customer Nrs •Consumption. •Actual Rates (unit charges, standing charges, services charges, etc). •Payment method used. •Security deposit required (yes/no). •Penalty clauses. •Legacy plan (yes/no & number of customers on such plans). •Annual average bill. 	<ul style="list-style-type: none"> •Electricity & Gas & Dual fuel plans. •Name of tariff offered. •Domestic (separate PAYG customers and vulnerable customers) & Small Business/IC. 	Suppliers.	Quarterly (monthly breakdown not required).	General commentary, not supplier detail.
End user price	<ul style="list-style-type: none"> •Customer numbers. •Consumption (MWhs). •Revenues. 	<ul style="list-style-type: none"> •Electricity & Gas. •All categories 	Suppliers.	Quarterly (monthly breakdown not required).	General commentary, not supplier detail.
Price Spread	<ul style="list-style-type: none"> •Highest price. •Lowest price. •Difference. 	<ul style="list-style-type: none"> •Electricity & Gas & Dual fuel Tariff offered. 	Calculated by CER using information on end user price and diversity of contracts.		All data, not supplier detail.

Consultation Questions:

Question 13 - Respondents are invited to comment on the whether the proposals for monitoring the diversity of tariffs are sufficient. Respondents are also invited to make alternative suggestions.

Question 14 - Respondents are invited to comment on the whether the proposals for monitoring end user prices are sufficient. Respondents are also invited to make alternative suggestions.

Question 15 - Respondents are invited to comment on the whether the proposals for monitoring price spread are sufficient. Respondents are also invited to make alternative suggestions.

Consultation Proposal 16: Retail Margins

Legislation stipulates that the CER is required to monitor final tariffs and to monitor whether the development and operation of competition is benefitting final customers. In addition, the CER is required to monitor in order to identify any distortion or restriction of competition in the market. In the 2013 consultation document the CER set out the information requirements on margins and the components comprising final price. This was in the context of CER's remit with regard to effective sight of market activity to ensure that prices are fair and reasonable and that there is transparency in the market.

Retail margins of energy companies reflect the return on their investment and can be an indicator of the state of competition in various markets. The collection of data on retail margins is to be examined alongside other indicators to give a complete overview of competition in the market. The publication of data on retail margins (and the other components of end price) promotes competition by ensuring continuous competitive pressures on prices in the retail market. This will ensure an appropriate level of transparency in the market.

The CER has access to data on certain components that comprise final price; however does not have additional information on some elements, such as supply costs or retail margins. In the consultation, the CER considered that the publication of retail margin data, even at aggregate level, would allow for comparison with the margins of companies in other jurisdictions and markets. Information on the retail margin is also of significant importance to ensure that the prices charged are fair and that customers are protected and benefiting from competition (in line with the CER's legislative duties).

The consultation document proposed the collection of data from suppliers on an annual basis on a number of indicators on the retail activity of suppliers including: revenues, generation (broken into a number of different sub elements), transmission use of system charges (TUoS), distribution use of system charges (DUoS), public service obligation levy (PSO)/carbon tax, supply costs, suppliers depreciation and amortisation (D&A), supply margin (earnings before interest and tax) and VAT. The proposal suggested to breakdown each component to three segments: domestic, domestic PAYG and non-domestic (all business segments combined). The CER proposed to publish aggregate data for each customer category and not the supplier level detail.

Consultation Proposal 16.

The CER is proposing the retail margin indicators as outlined in the table below.

Indicator	Unit	Categories	Provider	Reporting	Publication
Revenues	€ 000	•Domestic (separate out PAYG). •Non-domestic).	Suppliers.	Annual.	Annual. Aggregate for each customer category. No supplier detail.
Commodity – gas Generation – electricity	€ 000	•Domestic (separate out PAYG).	Suppliers.	Annual.	Annual. Aggregate for each customer

Indicator	Unit	Categories	Provider	Reporting	Publication
Broken down by: •SEM pool purchases(total purchases at SMP) •Contracts for difference payments •Capacity costs •Fuel & other hedging •Transfer cost of vertically integrated companies •Other non-SMP purchases (e.g. interconnector) •Total generation		•Non-domestic.			category. No supplier detail.
TUoS	€ 000	•Domestic (separate out PAYG). •Non-domestic.	Suppliers	Annual.	Annual. Aggregate for each customer category. No supplier detail.
DUoS	€ 000	•Domestic (separate out PAYG). •Non-domestic.	Suppliers	Annual.	Annual. Aggregate for each customer category. No supplier detail.
PSO/ Carbon tax	€ 000	•Domestic (separate out PAYG). •Non-domestic.	Suppliers	Annual.	Annual. Aggregate for each customer category. No supplier detail.
Supply Costs (excl D&A)	€ 000	•Domestic (separate out PAYG). •Non-domestic.	Suppliers	Annual.	Annual. Aggregate for each customer category. No supplier detail.
Suppliers D&A ³²	€ 000	•Domestic (separate out PAYG). •Non-domestic.	Suppliers	Annual.	Annual. Aggregate for each customer category. No supplier detail.
Supply Margin (EBIT) ³³	€ 000	•Domestic (separate out PAYG). •Non-domestic.	Suppliers	Annual.	Annual. Aggregate for each customer category. No supplier detail.
VAT	€ 000	•Domestic (separate out PAYG). •Non-domestic.	Suppliers	Annual.	Annual. Aggregate for each customer category. No supplier detail.

³³ Earnings Before Interest & Tax.

Indicator	Unit	Categories	Provider	Reporting	Publication
Total costs	€ 000	•Domestic (separate out PAYG). •Non-domestic.	Suppliers	Annual.	Annual. Aggregate for each customer category. No supplier detail

Table 8 Retail Margins

Consultation Question

Question 16 - Respondents are invited to comment on the proposals for retail margins. Respondents are also invited to make alternative suggestions.

Consultation Proposal 17: Arrears and Payment Plans

The number of customers in arrears is an important indicator in the context of market monitoring. Data on arrears shows the number of customers facing difficulty in paying their bills and will be used to inform customer protection policy. Data on the number of customers in arrears will provide information on the likelihood of a change in the demand for PAYG meters, number of payment plans and in disconnections, and will be an indicator of the effectiveness of the initiatives in place to support customers in difficulty.

The consultation paper proposed collecting data on a quarterly basis (broken down by month) from suppliers on the number of customers in arrears, the total value of the arrears, the number of customers on payment plans and the number breaking payment plans. The CER proposed to publish at an aggregate level and not to publish the supplier detail.

Consultation Proposal 17.

The CER is proposing the arrears and payment plan indicators as outlined in the table below

Indicator	Unit	Categories	Provider	Reporting	Publication
Arrears	•Customer Nrs in arrears. •Total Value (€000).	•Electricity & Gas •Debt days ³⁴ •All customer categories: domestic, PAYG, small business, medium & large business.	Suppliers.	Quarterly (with a monthly breakdown).	Aggregate, not supplier detail.
Payment plans	•Number of customers on payment plans. •Number of customers	•Electricity & Gas. •Domestic.	Suppliers.	Quarterly (with a monthly breakdown).	Aggregate, not supplier detail.

³⁴ The number of days customer is in debt: <30 days, < 60 days, < 90 days, > 90 days.

	breaking payment plans.				
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Consultation Question:

Question 17 - Respondents are invited to comment on the proposals outlined for measuring arrears. Respondents are also invited to make alternative suggestions.

Consultation Proposal 18: Contract Breakage Penalties

Contract breakage penalties relate to the penalties that are applied to customers that exit from a contract before a specified duration. It may indicate whether or not customers are fully aware of all the terms and conditions associated with contracts. The CER's Consumer Survey will further assist in determining this level of awareness. If a large number of customers are affected by penalties, this could also indicate that there are better deals available, even after a penalty has been applied. Such information is necessary in ensuring that there are no issues relating to customer awareness and to support the CER in its customer protection duty.

The consultation paper proposed the collection of annual data from suppliers (with a monthly breakdown) on the number of customer that incurred penalties in each customer category. It was proposed that data would be published at an aggregate level and not with the supplier detail.

Consultation Proposal 18.

The CER is proposing to collect data on the number of customers that incur penalties when they exit contracts early.

Indicator	Unit	Categories	Provider	Reporting	Publication
Penalties applied to customers	•Number of customers incurring penalties	•Electricity & Gas •All customer categories: domestic, PAYG, Small business, medium business & large business.	Suppliers	Annual (with monthly breakdown)	Aggregate, not supplier detail.

Table 10 Contract Breakage Penalties

Consultation Question:

Question 18 – Respondents are invited to comment on the proposals outlined for measuring contract breakage penalties. Respondents are also invited to make alternative suggestions.

Consultation Proposal 19: Customer Complaints

The monitoring of customer complaints is specifically required in legislation. Complaints measure the outcome for customers in the market and in particular the level of customer satisfaction. It is defined by ERGEG as the expression of a customer's dissatisfaction and that every complaint regardless of form (letter, email, phone call or in person) should be taken into account.

The 2013 consultation paper proposed the collection of quarterly data (with a monthly breakdown) from suppliers and networks on the number of customer complaints by complaint category for all customer categories.

Consultation Proposal 19.

The CER proposes the customer complaints indicator as identified in the consultation paper and in table below.

Indicator	Unit	Categories	Provider	Reporting	Publication
Customer Complaints	Number of complaints.	<ul style="list-style-type: none"> •Complaint Categories (see below). •Electricity & Gas. •All customer categories: domestic, PAYG, small, medium & large business. 	<ul style="list-style-type: none"> •Suppliers. •Networks. 	Quarterly (with monthly breakdown).	All.

Table 11 Customer Complaints

Complaint categories:

Network Categories	Supplier categories
Estimated Meter Readings	Billing Issue
Customer Service Issues	Payments (i.e. Charges, direct debit, price, refunds, deposits)
Billing Issues	Meter Issues
Meter Issues	Customer Service Issues
Quality of supply/interruption to supply	Marketing/Sales Issues
Siteworks Charges	Account Issues
Other Issues	Switching Issues
	Other Issues

Consultation Question:

Question 19 – Respondents are invited to comment on the proposals for monitoring customer complaints. Respondents are also invited to make alternative suggestions.

Consultation Proposal 20: Customer Enquiries

An enquiry is described as a request for information or advice. The collection of information on customer enquiries is identified as an important area for monitoring in the ERGEG guidelines. Coupled with other indicators, enquiries can identify if there might be issues relating to market processes for customers that require further investigation.

The consultation proposed the collection of quarterly data (with a monthly breakdown) from suppliers on the total number of enquiries for all customer categories.

Consultation Proposal 20.

The CER proposes the indicator on customer enquiries as outlined in the table below.

Indicator	Unit	Categories	Provider	Reporting	Publication
Customer Enquiries	Total number of enquiries.	•Electricity & Gas. •All customer categories: domestic, PAYG, small, medium & large business	Suppliers.	Quarterly (monthly breakdown).	Aggregate, not supplier detail.

Table 12 Customer Enquiries

Consultation Question:

Question 20 - Respondents are invited to comment on the proposals for monitoring customer enquiries. Respondents are also invited to make alternative suggestions.

Consultation Proposal 21: Other Proposals

In the first consultation paper in 2011, the CER outlined a number of other potential areas for market monitoring (barriers to entry, wholesale market liquidity, and innovation) and requested feedback from respondents as to the value in reporting these. The 2013 consultation proposed that the CER will not actively monitor the additional areas of market monitoring.

The CER considers these as important but suggested it was not necessary to monitor them specifically and that analysis would be undertaken on an ad hoc basis.

Consultation Proposal 21.

The CER will not actively monitor the additional identified areas of market monitoring.

Consultation Question:

Question 21 – Respondents are invited to comment on the CER’s proposal not to actively monitor barriers to entry, wholesale market liquidity, and innovation.

Consultation Proposal 22: De Minimis Threshold for Suppliers

The 2013 consultation document proposed a de minimis threshold for reporting so that small suppliers are not disproportionately affected by the new data requirements and that no customer is identifiable. CER suggested exempting suppliers with market shares of less than 1% of consumption or 4 customers in electricity and 1% of customers in gas, with the exception of the customer satisfaction indicators (customer complaints and enquiries). It was proposed that the CER would not report on data for suppliers with market shares of less than the threshold and that such data would be included in an ‘others’ category.

Consultation Proposal 22.

De minimis thresholds of 1% of consumption or 4 customers in electricity and 1% of customers in gas will be introduced. Suppliers with market share of less than the threshold will not be required to submit monitoring data (with the exception of market satisfaction indicators) to the CER until the threshold is reached. The CER will not report data for suppliers with market shares of less than the threshold for any indicator. Data for these suppliers will be included in an ‘others’ category for the indicators that the CER has data for such suppliers.

Consultation Question:

Question 22 - Respondents are invited to comment on whether the de minimis threshold is reasonable. Respondents are also invited to make alternative suggestions.

Annex 2 Summary of Consultation Responses

Consultation Proposal 1-3: Market Segmentation

Summary of Respondents Comments

Six respondents commented on the market segmentation proposals (Bord Gáis Networks, ESB Networks, SVP, Electric Ireland, Bord Gáis Energy and Vayu).

There was general agreement across responses that the current method of segmentation should be continued (ESB, Vayu, Bord Gáis Energy, Electric Ireland). Bord Gáis Networks considered that there is one category missing from the gas segmentation, AQ >73,000 kWh and SPC < 3,750kWh.

Vayu suggested that there may be a more appropriate segmentation of electricity customers into quarter hourly (QH) or non-quarter hourly (NQH) which could then be subdivided into the DUoS categories. Vayu considered that this would help in keeping costs down, and noted that a number of DG 5 customers will fall into both QH and NQH.

SVP suggested that the domestic market could be segmented further into the following categories: standard credit customers (in receipt of read/estimated bills every 2 months); equalised credit customers (in receipt of a averaged bill every 2 months); PAYG customers (who have received a PAYG on hardship grounds, with token meter customers as a subset of this); prepay lifestyle choice customers. SVP considered that it is necessary to differentiate between the lifestyle choice and financial hardship segments of the PAYG market as there is a degree of confusion in the market. SVP also suggested that it is necessary for the CER to differentiate between customers on standard and day/night tariffs.

With regard to the proposal that Networks would submit data based on Eurostat bands once a year, both ESB Networks and Bord Gáis Networks agreed with the proposal to submit data based on the Eurostat bands once a year. Vayu considered that there were no perceived benefits associated with this proposal and that the additional cost of this proposal on Network companies would be recovered from suppliers.

As to the naming convention in gas, Bord Gáis Energy and Electric Ireland were in agreement with the proposal. Bord Gáis Networks raised an issue with regard to the proposed breakdown in gas, that one categorisation was excluded from the proposal (AQ >73,000kWh and SPC <3,750kWh). Bord Gáis Networks suggested an alternative segmentation which is identified in its submission that is published alongside this decision. Vayu suggested that given that the non-domestic market is fully deregulated there are few additional benefits from the additional segmentation that was proposed in the clarification. Additionally Vayu suggested that introducing additional segmentation would add to the costs for suppliers.

CER's Response to Comments

In view of the comments received that maintaining the current market segmentation would result in the least cost and impact to IT systems and processes for all parties involved in the submission of data to the CER, the CER has decided to maintain the current segmentation. The current method of market segmentation in electricity and gas, as noted in the consultation paper, would also allow for ease of comparison with historical data.

The CER notes BGNs comment with regard to the segmentation in gas but considers that as the highlighted segment is currently included within the IC category it is not necessary to add it as a separate segment.

With regard to Vayu's suggestion on QH and NQH breakdowns, the CER considers that in electricity it is necessary to get data at DG level due to the fact that to date the market has been reported on in this manner. The CER understands that there may be issues in reporting certain DGs in the QH and NQH breakdown and considers that such a breakdown could create issues in undertaking historical comparison.

The CER appreciates the feedback from SVP regarding the usefulness of the breakdown they suggested. Having reviewed this it is considered that this might add complexity in reporting as it would be required for all indicators. However, the CER suggests that some of this information will be captured in the diversity of contracts indicator. The CER notes that it can currently segregate between PAYG for financial hardship and for lifestyle choice purposes and that this will continue as part of any new reporting.

The CER welcomes the networks support for the annual indicator based on the Eurostat breakdown. The CER does not agree with Vayu that there are no additional benefits to the reporting of customers and consumption in the Eurostat segmentation once a year. Currently Eurostat publishes data on the average price for each consumption band (for domestic and non-domestic categories using data collected by SEAI). The CER considers it necessary to be aware of the number of customers that fall into each band.

As to the proposal on the renaming of the gas segments in CER reports, the CER is not convinced of the benefits of including an additional segment in the reporting of CER as suggested by BGN. However, if a new category is required the CER will issue ad hoc requests as required. The CER considers that while changing the naming convention would add clarity to the market monitoring reports, the CER has not received the necessary information to determine if the new naming convention is adequate or not. Therefore the CER will continue with the current naming convention.

Consultation Proposal 4: Switching

Summary of Respondents Comments

Seven respondents commented on the switching proposals (Bord Gáis Networks, ESB Networks, SVP, Electric Ireland, Bord Gáis Energy, Vayu and Energia). While respondents supported the proposed indicators in general, a number of issues were raised with regard to reporting.

Bord Gáis Networks suggested that it would not be able to distinguish a financial hardship PAYG customer from the switching data (only PAYG as a whole, including both lifestyle choice and financial hardship). With regard to the provision of data on the change of legal entity (CoLE), Bord Gáis Networks stated that it is currently unable to quantify CoLEs as all changes of supplier (CoS) are CoLE on Bord Gáis Networks IT systems. It stated that it is also not possible for it to create reports on the time to complete a switch and requested more information on the definition of delayed and failed switches.

With regard to repeat switching, Bord Gáis Networks and ESB Networks noted that some sites may be recategorised into a different segment in the period of a year. ESB Networks noted that this will impact on the interpretation of the repeat switching indicator. ESB Networks did not raise any other significant issues with regard to the development of the proposed reports.

Electric Ireland and Bord Gáis Energy accepted all the proposals on switching.

Vayu requested additional information with regard to the definition of a dual fuel customer and the reasons for collecting this data. Vayu suggested that it should apply to domestic customers only as I&C customers procure their energy requirements in a different manner to households. Energia also considered that it is not possible to report on dual fuel switching in any category other than the domestic category.

Vayu raised concerns over the fact that Bord Gáis Networks cannot currently separate out FVT switchers in the data as was outlined in the consultation paper. Vayu considered that recent changes and upgrades to the market messaging platform should have allowed for this.

SVP suggested that it would be useful to analyse the number of switches that failed/were rejected due to the debt flagging process to help assess the impact of debt flagging.

CER's Response to Comments

The CER welcomes the broad agreement to the proposals in the responses to the consultation.

As switching is specifically required to be monitored in legislation, the CER intends to continue and to expand its collection and analysis of switching data. Switching is a key indicator of customer engagement and competition in the market. Switching was a key criterion for the deregulation of the domestic markets in electricity and in gas and it is necessary that the CER continues to monitor the situation. It is also important for the CER to monitor the switching process to ensure that it is working for customers. It is necessary to ensure that the CER has adequate oversight of market activity so that the effectiveness of

the process can be monitored. In summary, the monitoring of switching is fundamental in the monitoring of the retail market.

The CER acknowledges the point raised by Bord Gáis Networks in relation to the distinguishing between lifestyle choice and financial hardship PAYG gas customers and suggests that data for PAYG in total is provided by BGN (including both subsets of PAYG customer).

As to Bord Gáis Networks comment on the CoLE, the CER considers that this information is necessary and that systems must be appropriately upgraded to take account of this.

The CER acknowledges the concerns raised by both networks regarding the repeat switching indicator and will include a note in any analysis stating that some customers may have recategorised in the period.

In relation to the dual fuel indicator, the CER is stating that the data is required to be provided by the losing supplier for domestic customers only. CER currently does not receive this data, however, given the number of such customers and the number of dual fuel offers, the CER considers it important to collect such data on this cohort of customer.

The CER understands Vayu's concern that the FVT segment is currently not reported and agrees that this data must be provided by Bord Gáis Networks.

The CER agrees with the SVP's point in relation to debt flagging and such an indicator is included in this Decision.

With regard to definitions, when a switch is not completed (times out or is cancelled), this is considered a failed switch. Together with delayed switches, this indicator would provide information on whether the switching process is operating effectively for customers. A delayed switch is one which is completed outside of the recommended timeframe to complete a switch. The 3rd Package requires that switches requested by customers are completed within 3 weeks. The CER proposed in the 2011 consultation paper that a delayed switch will occur when:

- A switch with a customer read – over 3 weeks of the MRSO/GPRO receiving the request from the supplier.
- A switch with a scheduled read – over 2 weeks of the scheduled read.

Consultation Proposal 5: Renegotiations

Summary of Respondents Comments

Three respondents commented on the renegotiations proposal (Bord Gáis Energy, Vayu and Electric Ireland). While Electric Ireland accepted the proposal in the consultation, concerns were raised by the other respondents about the structure of the proposal.

Bord Gáis Energy suggested that these indicators should be limited to the business market as they considered that the indicators are not as insightful in the

domestic market. The reason given for this is that in the domestic market, Bord Gáis Energy states that its customers are offered introductory discounts for a certain period and at the end of the period they move to a standard tariff. Bord Gáis Energy stated that in general, suppliers do not offer a further discount to an existing customer. Bord Gáis Energy also noted that suppliers' standard rates are competitive and because of this defaulting to the standard rate may not be a negative thing.

Vayu considered that a clearer definition of renegotiation was required in order to confirm if it only includes a successful renegotiation. Vayu also noted that a number of customers contract for sites on an aggregated basis as sites may be categorised in multiple segments and that there may be bespoke arrangements in place meaning that defaulting to the standard tariff is not an option. Vayu suggested that such sites should be excluded from the reporting.

CER's Response to Comments

Renegotiations refer to the renegotiation of a contract by any customer with existing supplier, no matter how long the customer is with a supplier. The collection of data on renegotiations complements the switching data and gives a more complete picture of customer engagement. If customers are found not to be engaging with suppliers, this could potentially indicate an issue in the market (and may require further investigation). While renegotiations is not specifically identified in legislation, the CER agrees with ERGEG's suggestion that it is beneficial to collect data on renegotiations in order to get a complete picture of customer engagement. Such an indicator can be linked to the CER's duty of customer protection and renegotiations are also necessary in showing the options that are available to customers.

Defaulting to the standard tariff shows whether customers are engaging with the market and if they are aware of the possibility of defaulting to the standard rate. The defaulting indicator will assist the CER in determining if actions need to be taken to ensure that customers are better informed.

The CER acknowledges Vayu's comment on the definition and considers that data should be collected on the number of completed renegotiated contracts and also on the number of contacts to renegotiate that are made by customers to the supplier (whether or not this leads to a successful renegotiated contract). With regard to Vayu's comment on bespoke contracts, the CER suggests that sites with bespoke contracts are excluded from the renegotiations indicator.

The CER does not consider, as suggested by Bord Gáis Energy that the indicators should be limited to the business market as it is the responsibility of CER to ensure that the market works for all customers and that all customers are protected and engaging. The CER is of the view that it is possible in some instances that suppliers may offer customers alternative discounts at the end of an existing discount period if a customer so requests. Therefore the CER would be interested in seeing data on the number of customers defaulting to the

standard tariff. The CER would note that when data is submitted, suppliers may include specific comments in relation to any trends apparent in the data.

Consultation Proposal 6: New Connections

Summary of Respondents Comments

Three respondents commented on the connections proposal (Bord Gáis Networks, ESB Networks and Bord Gáis Energy).

Bord Gáis Networks raised a number of issues regarding the reporting of connections data and stated that an IT evaluation was required. They required clarification that the data only referred to distribution connected sites. Bord Gáis Networks stated that it may be difficult to report on PAYG or large business as it is not specified in the work order for connection. Regarding the time to connect indicator, Bord Gáis Networks stated that the data needs a caveat stating that delays may not always be due to the fault of networks and that customers can request a connection but request it for a time in the future.

While ESB Networks agreed with the proposals, they raised reservations on the time to connect indicator. ESB Networks suggested that there are issues around when a customer requested the work (e.g. whether it referred to when a customer is quoted and other issues such as if a job stalls due to a customer failing to provide the required permits).

Bord Gáis Energy agreed with the proposals but suggested that time to connect should be reported quarterly, not annually, to provide greater insight and to develop and propose changes more responsively. Bord Gáis Energy also suggested that disconnection times and success rates should be included in the proposals for monitoring.

CER's Response to Comments

The CER is of the view that not only is data on new connections an indicator of market activity, it is also an indicator of the awareness of customers to the fact that they have a choice of supplier to connect to. The time to connect is an important metric to examine the process and how it might affect customer experience in the market.

The CER notes BGEs support and the concerns raised by both ESNB and BGN with regard to the time to connect indicator. While the CER considers that this indicator is important to understand how the process can affect the customers experience, the CER is of the view that this indicator could be monitored on an adhoc basis by the CERs retail team. The CER notes that ERGEG suggested it as a useful indicator and suggests that the Network team in CER already monitor such.

With regard to BGE suggestions on disconnections, the CER acknowledges the usefulness of the suggested indicators and responds to this in the disconnection section of this decision.

Consultation Proposal 7: Repairs

Summary of Respondents Comments

The three respondents to this proposal (Bord Gáis Energy, ESB Networks and Bord Gáis Networks) were in agreement with the proposals on repairs.

CER's Response to Comments

The CER welcomes the responses to this proposal but considers that repairs will be monitored annually through the ongoing networks monitoring and incentives process in CER.

Consultation Proposal 8-9: NPA Disconnections and PAYG Installs

Summary of Respondents Comments

There was general support for the disconnection proposals by four of the respondents to this question (Bord Gáis Networks, ESB Networks, SVP and Bord Gáis Energy). Issues that were raised centred on the reporting of the data and some respondents suggested a number of other indicators. Energia questioned the relevance of the proposals on disconnections given the work of the Disconnections Taskforce in 2014.

Bord Gáis Networks stated that they currently cannot identify 'NPA' disconnections and that it could be assumed that all credit locks are NPA. ESB Networks stated that a new report will be required which will include a 'city' field and noted that this may not equate to the same field in gas. ESB Networks also requested more clarity regarding the distinction between billed and current supplier.

Regarding the time to reconnect, Bord Gáis Networks stated that while it can facilitate a report on the time difference between lock and unlock, they will not be able to differentiate based on CoLE. ESB Networks assumed that it was a rolling report that was being suggested and stated that it can determine the CoLE by comparing the name on the disconnection and the reconnection order.

Bord Gáis Networks stated that it can provide data on PAYG for financial hardship and on PAYG reverting to credit. ESB Networks stated that a new report will be required for PAYG for financial hardship as proposed in the consultation. ESB Networks stated that it can provide data on PAYG reverting and that this data will be based on TCC0 (with the assumption that this represents credit mode).

The other respondents were in agreement with the disconnection proposals and some suggested additional indicators. SVP welcomed the proposals on disconnections and self-disconnection and suggested that a more technical study of the PAYG market may also be able to monitor usage in sample households to investigate the issue of under-usage (as opposed to self-disconnection). SVP also suggested that more analysis is required of households in arrears but that cannot avail of PAYG meters (e.g. day-night tariff households etc.). SVP considered that it would be useful to collect data on the number of households that are disconnected despite involvement in payment plans and also on threatened disconnection (measured by the number of letters etc.). SVP suggested that it should be possible for industry to record the number of customers who have assistance from a 3rd party flagged on their accounts. Bord Gáis Energy suggested additional indicators on the time taken to disconnect and on the number of disconnection requests.

As to self-disconnections, issues were raised in all responses in relation to the measurement of this indicator (Bord Gáis Networks, ESB Networks, Electric Ireland, Energia, Airtricity and Bord Gáis Energy). Both networks suggested that data is not available to networks. Bord Gáis Networks considered that suppliers have aspects of a measure and gave the example of emergency credit debt information. ESB Networks stated that they do not have access to customer vending history. ESB Networks stated that consumption information is required to measure this and that this information is not available at real-time.

Electric Ireland stated that it is not possible to determine if a customer has self-disconnected and suggested that any measure would be based on many assumptions which may make the measure misleading. Electric Ireland also suggested that a workshop would be required if accurate figures are necessary. Airtricity recognised the merits of a self-disconnection indicator but suggested that there may be many reasons why a customer may 'self-disconnect', including run out of credit and unable to top-up, short term lets, habitual disconnections, holidays etc. Bord Gáis Energy and Airtricity considered that the trends and reasons for trends must be established before figures are published so that assumptions will not be drawn from the published data. Bord Gáis Energy considered that it is not possible to measure with current PAYG technology and that the only means of measurement is to undertake a consumer survey. Energia also suggested the use of surveys to monitor self-disconnections.

CER's Response to Comments

The CER welcomes the responses to the consultation question and the general support for most of the proposals put forward.

Legislation specifically states that disconnections are to be monitored. Suppliers are required to treat disconnections as a last resort and must provide customers with assistance to manage their bills (as stipulated in the Supplier Handbook). In response to Energia's comment, it is the CER's responsibility to ensure that customers are protected and that disconnections are a last resort. There are a number of measures in place to ensure disconnections of customers in difficulty

are minimised and the CER must monitor the market to ensure that such measures are effective.

While BGN stated that it cannot determine NPA-specific disconnections, the CER reiterates again the importance of distinguishing NPA specific disconnections in the gas data. The CER currently receives data on credit locks, disconnect meters and CTSRs (street isolations) from BGN. The CER would like NPA to be specified in the issuing market message from a supplier so that BGN can determine if the disconnection is for NPA reasons or not. Until the point at which the market messages are updated and NPA specific reports are developed, the current reporting will continue.

While the CER is requesting NPA disconnection data by supplier, in the consultation paper the CER suggested that information on the billed supplier associated with each disconnection is provided, along with the identification of the current supplier. In some instances currently, the data that the CER receives can associate a disconnection with a supplier that did not request the disconnection. This occurs if a customer switches supplier after being disconnected. Data on the billed supplier (i.e. the supplier that requested the disconnection) will alleviate this issue and will assist in the data validation process. The CER also proposes that the current supplier be identified so that the extent of this issue is known.

The CER again reiterates the importance of separating CoLE information from the data and requests that necessary changes are made to BGN processes to ensure that this data can be extracted. The CER welcomes ESBNs response on the time to reconnect and clarifies that a rolling report will be required. The CER will collect this data from networks and requests that both ESB Networks and Bord Gáis Networks submit data on the time to reconnect disconnected properties (NPA only) by MPRN/GPRN excluding where a CoLE has taken place. As outlined in the consultation, the data to be submitted will cover the disconnections that occurred during the quarter six months before the reporting quarter, e.g. a report submitted in Q3 2014 will show the reconnection times of disconnections that were completed in Q4 2013. The CER considers that it is imperative that it has clear sight of exactly the extent to which, and how, customers are being affected by disconnections.

With regard to vacant premises, in March 2014, BGN and ESBN introduced a new method of identifying the proportion of disconnected sites that were vacant. The CER considers that it is necessary for this data to continue to be submitted on a regular basis.

The CER welcomes the fact that both BGN and ESBN can develop reports on the number of PAYG customers reverting to credit and notes that any issues associated with reporting should be sent to CER as forms are submitted.

There are a growing number of PAYG meters being installed which support customers who have difficulty paying bills and for the purposes of energy management. The current disconnections measure only examines customers who have credit meters and who are disconnected at the request of a supplier.

Customers with PAYG meters may on occasion self-disconnect and currently there is no measure for this. The CER notes that the Consumer Survey 2014 contained questions in relation to self-disconnection. While this provides some information, it is based on a relatively small sample of customer's with PAYG meters. While the CER is of the view that it is important to monitor if PAYG customers are still having difficulty even after a PAYG meter has been installed, a range of issues were raised in the responses to the consultation in relation to the measurement of self-disconnection. The CER agrees that a measure using currently available information (e.g. vend information) would not yield accurate results as the information that is available is limited. A measure for self-disconnection would ideally be constructed using real time information on consumption but such information is not available. The CER also agrees with the concerns raised by respondents regarding the interpretation of the data which add to the issues involved in constructing a proxy measure. While the CER recognises the importance of ensuring that all customers are protected, at the present time there is no effective measure for the number of PAYG customers self-disconnecting.

While the CER welcomes and acknowledges the usefulness of the indicators proposed by SVP, the CER is of the view that it may be difficult to develop a measure for 'under-usage'. The CER notes that the policy relating to the accessibility to PAYG meters is currently being investigated in other fora, however wishes to highlight that the Consumer Survey 2014 contained a question related to this (on account of a suggestion by SVP prior to the commencement of the survey fieldwork). The CER sees the merit in measuring the number of PAYG meters not successfully installed as suggested by SVP and has included an indicator on this. The CER takes on board SVP suggested indicator on the payment plans and disconnections and has included such an indicator in the arrears section. With regard to customers with 3rd party assistance, while the CER does consider this useful, it considers that data can be collected on an ad hoc basis.

The CER welcomes BGEs suggested indicators on the time taken to disconnect and the number of disconnection requests. The CER agrees that while the number of completed disconnections is necessary, it is of interest to look at other aspects of the disconnection process. The CER currently receives some information from ESNB on incomplete disconnections and the reasons for these. The CER requests that similar data be provided by BGN on incomplete disconnections. While the CER understand the merit of a 'time to disconnect' indicator, it considers that such data can be requested on an ad hoc basis rather than a regular data requirement.

The CER has altered slightly the breakdown of data required as part of the PAYG installs indicator to take account of an earlier SVP comment. It now requests that the domestic market is broken into DG1-1, DG 1-2, DG 2-1 and DG 2-2 in electricity.

Consultation Proposal 10: Debt Flagging

Summary of Respondents Comments

There were four responses (Bord Gáis Networks, ESB Networks, SVP and Bord Gáis Energy) received on the debt flagging proposals.

SVP agreed with the proposals and suggested the collation of data on the number of debt flagged customers who opt for lifestyle choice pre-payment meters.

Bord Gáis Networks stated that while data can be provided, there is an issue regarding the granularity of the data for such a small number of instances given that the collation of the report is a manual exercise.

CER's Response to Comments

The CER welcomes the general support for the debt flagging indicator and notes that currently data is received monthly from both networks.

With regard to SVPs comment, the CER recognises the importance of knowledge on the activity at supplier level and whether debt flagged CoS requests are accepted or cancelled by suppliers. The CER is requesting that networks provide data on all suppliers (including lifestyle choice as relevant) as part of this indicator and notes that it already has such information on gas debt flagging.

The CER notes BGNs point in relation to it being a manual exercise but considers it necessary that it monitors the progress of the debt flagging initiative. In order to do this, the CER requires data for **all** customer categories that are subject to debt flagging as different thresholds are applicable to each. The CER therefore requests that BGN investigates how it can upgrade its systems so that FVT data can be easily collated.

Consultation Proposal 11: Market Share and Active Suppliers

Summary of Respondents Comments

Bord Gáis Networks stated that they will continue to report on market share as currently and include new bands for PAYG. They requested clarification with regard to the reporting requirement for vulnerable customers.

ESB Networks agreed with the proposals however raised an issue regarding the timing for producing the market share reports as the two-monthly billing cycle is fundamental so data is only available for NQH sites after two months.

SVP considered that there is merit in collecting data on vulnerable customers. SVP stated that it is important to highlight that vulnerable customers excludes financial hardship. Airtricity stated that confirmation is required that vulnerable only refers to registered vulnerable. They considered that analysis of the data

should take account of the possibility that new entrant suppliers may have higher levels of registered vulnerable customers.

Electric Ireland and Bord Gáis Energy accepted the active supplier proposal.

CER's Response to Comments

The CER welcomes the support for the market share and active supplier indicators.

With regard to vulnerable customers, the CER wishes to clarify that this relates to registered vulnerable customers. A vulnerable customer is defined as a household that is:

- critically dependent on electrically powered equipment, which shall include but is not limited to life protecting devices, assistive technologies to support independent living and medical equipment, or,
- particularly vulnerable to disconnection during winter months for reasons of advanced age or physical, sensory, intellectual or mental health.

The CER is requesting data on market share for all customer categories and for vulnerable customers as a subset of domestic.

The CER notes BGNs comment in relation to PAYG and considers that PAYG should also form a subset of the domestic category. While data on PAYG installs is being collected, the PAYG market share data would show the PAYG market share of each supplier. PAYG in this instance refers to sites where a PAYG meter is currently in operation and where the customer has not reverted to credit mode.

The CER acknowledges ESBNs point regarding the timing of the reports and given the difficulties identified by ESBN in producing monthly reports and the importance of keeping costs to a minimum, the CER considers that the current frequency of submitting rolling quarterly reports on a monthly basis will be maintained. The CER wishes to highlight the importance of the information and would request that this information be provided at the earliest possible time after the metering data has been finalised.

Consultation Proposal 13-15: Diversity of Contracts, End-User Price and Price Spread

Summary of Respondents Comments

Vayu suggested that if a supplier has less than 1% of its customers in that sector on a tariff that this group should not be included in the reporting requirements. In addition, they suggested that customers with bespoke contracts are also excluded.

Energia raised concerns regarding the level of detail proposed as part of the diversity of contracts proposal. They questioned why the proposals deviated from the ERGEG guidelines to include other customer categories rather than just the

domestic category. Energia suggested that for the small/IC business segment there are multiple different contracts and many are updated on a weekly basis. They also suggest that it may not be possible to compare between the contracts of various suppliers as the products might be different. In addition, Energia suggested that the information on contracts might be regarded as commercially sensitive.

Electric Ireland suggested that most of the information required is already available to the CER but that information on consumption associated with price plans is commercially sensitive. Electric Ireland suggested that the compulsory provision of such information will discourage innovation and stifle competition and suggested that an overall total (for customers and consumption) for all categories would provide information at the required level. Electric Ireland considered that this proposal will require the development of new software which will impose unnecessary costs to be borne by final customers.

Bord Gáis Energy was in agreement with the diversity of contracts proposal. While largely in agreement with the end user prices indicator, Bord Gáis Energy had a concern that end user price applies to all categories. Bord Gáis Energy suggested that it is not appropriate to compare prices of a supplier offering few bespoke contracts to LEUs while other suppliers offer more contracts. Bord Gáis Energy suggested that price comparisons should be limited to mass market consumers. SVP welcomed the proposal and suggested that end-user prices in the life-style prepayment meter market should be categorised. Vayu suggested that customer numbers information should not be required as part of this indicator. Electric Ireland and Energia suggested that there is sufficient market information already available and question the usefulness of the indicator.

Bord Gáis Energy did not consider price spread as necessary and suggested that the CER should point to price comparison websites. Electric Ireland was also of the view that price spread information is already available on websites. Airtricity considered that while there is benefit in a price spread indicator, it should be limited to current and available tariffs only and that legacy tariffs could artificially distort customers' impression of what is available to them if presented in price spread. Vayu did not see why a split by supplier is required as the information is to be published at aggregate level. Vayu considered that enough information is detailed in the diversity of tariffs indicator to calculate this.

CER's Response to Comments

The CER is of the view that data on the diversity of contracts, end user price and price spread are fundamentally important as indicators of competition and of the options available to customers. The CER considers it necessary to continuously monitor the level of customer engagement and the choices that are made and can do so with this information. Without such information, the CER cannot determine if customers are benefitting from the competitive markets that exist currently. The CER considers that it is important not to monitor end prices in isolation and is of the view that it is necessary to analyse price component and contract information alongside price data to ensure that trends can be interpreted

accurately. In addition the CER considers that the diversity of contracts indicator provides necessary qualitative information on plans and on the non-price related choices that customers are making.

With regard to Electric Ireland's comments on the diversity of contracts, the CER does not consider that total figures for each market segment provides sufficient data and considers that such information allows the CER to undertake informed analysis and monitoring. The inclusion of customer numbers and volume for each tariff type allows the CER greater insight into the market and the choices customers make. The CER will not publish the supplier level detail in relation to diversity of contracts so this helps alleviate any concerns about perceived commercial sensitivities and with regard to confidentiality (see section 2.3 earlier). The CER proposes that aggregated data only be published (e.g. the number of plans available, the proportion of customers on standard plans, payment methods available, etc.). The CER has not been provided with any evidence of the changes to systems that would be required as suggested, and considers that such data is already available in this form. Any additional elements are not thought to raise significant burden.

The CER acknowledges suppliers comments in relation to customers that are on bespoke plans. The CER is of the view that customers on bespoke plans should not be reported individually. Therefore the CER considers that a separate subsegment should be introduced into the reporting of each market on 'bespoke plans'. This would report on the number of customers on bespoke plans (i.e. individually tailored plans), the consumption associated with this group of customers and the average unit and standing charges.

In relation to the end-user price indicator, the CER is suggesting that revenues, customer numbers and consumption relating to each different market segment be provided to the CER by each supplier. This data will be used to determine an average price for each market segment. The CER is not looking for specific details of revenues associated with different plans as part of this indicator. The CER acknowledges Vayu's comment on customer numbers but suggests the submission of this data for completeness.

The CER does not consider, as suggested by Electric Ireland, that information on end-user prices is already available. The CER considers that it is its responsibility to ensure that all customers are protected and as it has limited the diversity of contracts proposal to the reporting of just domestic and small business/IC customers, the end user price indicator will be used to monitor all categories. BGE had suggested that bespoke plans be excluded. The CER is not of the view they should be excluded from this indicator given that this indicator refers to total revenue, consumption, customers per market segment (not at tariff plan level).

In relation to SVPs comment, the CER will be requiring data on end prices from all suppliers (above the de minimis threshold) and so will have separate data on the prices for lifestyle choice and credit customers. Cognisant of an earlier comment by SVP, the CER suggests that for the electricity domestic segment a

breakdown by DG group be provided so that an analysis of urban, rural and day-night customers can be undertaken.

The CER proposed that it calculates price spread using the data that is submitted by suppliers but that the supplier detail would not be published as part of this. To clarify, no additional data would be required from suppliers as part of this indicator. The CER acknowledges the point raised by Airtricity that any analysis will require commentary about what is actually available to customers. Given that this framework outlines the data that the CER will collect from suppliers and networks, the CER has not included the price spread indicator in the summary as it will be estimated by the CER on an ongoing basis using the diversity of contracts and end-user price data.

Consultation Proposal 16: Retail Margins

Summary of Respondents Comments

Comments were received from seven respondents (EAI, Electric Ireland, Bord Gáis Energy, Airtricity, Vayu, Energia and the Competition Authority). Respondents raised concerns over the proposed retail margins indicator.

The EAI, Electric Ireland and Bord Gáis Energy had concerns over the CER's legal powers to examine retail margins. Bord Gáis Energy stated that while monitoring is 'not limited' to the areas identified in legislation, it does not create a limitless list of new functions. Bord Gáis Energy also stated that Ofgem's powers to collect such information differ from what is being proposed in the consultation paper. Bord Gáis Energy considered that ERGEG does not propose a retail margin indicator as ERGEG state that the monitoring and analysis of retail margins is complex.

There were issues raised in the responses in relation to the use of margins to assess competition. The EAI suggested that retail competition results in a reduction in margins and elimination of the least efficient competitors and that competition is best measured using market share data. EAI stated that suppliers are of the view that current monitoring tools are adequate to monitor the market. EAI suggested that the same metrics that were used in deregulating the markets should be sufficient to monitor competition in a deregulated market. Electric Ireland suggested that current monitoring of prices, switching and market involvement provides sufficient transparency in relation to participation and competition. Airtricity stated that it is unclear why established tools for measuring competition (market share) are not being used to ensure the effectiveness of retail competition and why new indicators are required for this purpose. The Competition Authority suggested that the publication of data on margins is not necessary in a competitive market and would lead to less competition in the market. Bord Gáis Energy considered that it is inappropriate in a competitive market for margins to be required and may hamper the development of a competitive market, by undermining confidence, and discourage new entrants. Bord Gáis Energy considered that the CER has not expressed concerns over

competition and so is unclear as to why margin information is required at this stage.

With regard to the reasons for collecting the data, the EAI stated that the consultation paper has not demonstrated that there is a problem in the market and that the necessity of the indicator is not justified. Vayu also raised the question as to what the CER will do with the data once received. Vayu noted that while price is a driver for procurement decision in the IC sector, customers look for other things in their decisions including other value-add services and customer service levels. Airtricity stated that it is unclear how this information is required, at this time, and will be used to monitor competition. The Competition Authority stated that sanctioning firms for being too efficient (which leads to high profit margin) would send a negative signal to the market leading to less investment and leaving customers worse off.

A number of respondents raised concerns about the cost categories proposed and the development of responses for submission. The EAI stated that the retail margin indicator is problematic as it requires detailed allocations across a large number line items broken down by tariff group. It considers that supplier costs are not incurred on this basis so cost methodologies will need to be developed and different methodologies across industry will impact on the accuracy of comparisons. Electric Ireland stated that the proposal would require suppliers to develop new structures to allocate costs and risks across customer categories that are not a part of the normal operation of a business. Electric Ireland stated that it will be difficult to collate the data in a consistent and transparent manner at the granular level requested. Electric Ireland stated that there are a number of factors that can distort any view of margin, including: variation between suppliers on an appropriate risk/reward balance; variations in suppliers' customer portfolios; and variations in suppliers' calculation and appetite for risk. Electric Ireland suggested that if the CER decides implement the proposal that this could be done through adjustments to rules, procedure and standards pertaining to audited annual regulated accounts. Vayu also suggested that each supplier will employ different risk mitigation techniques which will require guidance, without which the allocation of costs could be open to manipulation. Vayu was unclear as to how activities of business units are to be captured within the framework (including gas commodity trading, CfDs) as well as any ancillary services that suppliers provide (e.g. energy audits). With regard to individual components, supply costs, depreciation and amortisation, Vayu stated that such costs are incurred for the entire business, not one specific segment and that splitting these costs below gross margin line will be an issue given the differing views among suppliers as to how this should be done. Vayu stated that this will be a timeconsuming exercise. Vayu did not consider it appropriate to align the reporting timetable with the tariff year as most suppliers have December year ends and would thus not be able to provide audited data for the tariff year. Airtricity also suggested that this information is not available in the format proposed and suggested that the information would not be comparable. The Competition Authority stated that it is difficult to draw inference from retail margins given that firms choose different methods of allocating costs across

different business units and products, and that attributing profits to one unit is likely to be complicated.

Some respondents suggested that it would be burdensome to provide information in the proposed format. The EAI suggested that this indicator introduces unnecessary red tape and suggested that while Ofgem have introduced similar requirements, the Ofgem measure is less onerous than the CER proposal. Vayu suggested that there is a significant degree of detail being sought by the CER that would require significant cost and burden for suppliers to implement. Vayu suggested that suppliers may have to pass the associated cost onto customers. Vayu stated that the proposal is intrusive, bureaucratic and overly expensive for small suppliers and suggest that a CBA is necessary. Airtricity considered that the retail margin requirement is not proportionate given the lack of benefit to be gained from such an indicator. Energia and Airtricity raised concerns that the data on retail margins was commercially sensitive.

The Competition Authority stated that the costs outweigh the benefits that the data would contribute to an analysis of competition. The Competition Authority stated that suppliers employ different hedging strategies which are commercially sensitive. The Competition Authority considered that as energy suppliers are searching for new ways to price and pay for energy and new services, some suppliers may sacrifice margin in particular periods to introduce such services. The Competition Authority stated that it would not be possible for suppliers to offer the range of offers and be profitable by disclosing information on their margins and strategies to competitors.

In relation to the proposed publication of aggregate data, the Competition Authority suggested that the publication of the data would provide a focal point for price coordination between suppliers. Given the perceived difficulties in measuring margins, the Competition Authority stated that the publication of such may not be informative and raised the possibility of the threat of collusion. Bord Gáis Energy considered that it is unclear why the publication of the data would increase transparency and reduce barriers to entry. Bord Gáis Energy outlined the differences between the market in Great Britain and the market in Ireland and stated that Ofgem conducted a supply probe prior to requesting the

margin data which found competition concerns.

CER's Response to Comments

The CER notes the responses received to the retail margins indicator and notes that overall there were concerns regarding the level of detail required, perceived commercial sensitivities, the construct of the indicator and the perceived knock-on negative implications on prices. In this decision the CER has reduced significantly the amount of detail required as part of this indicator. While this is the case, in responding to the matters raised in the responses to the consultation, the CER would reiterate all the comments it made on this matter in the 2013 consultation paper³⁵.

Legal basis

Legislation stipulates that the CER is required to monitor final tariffs and to monitor whether the development and operation of competition is benefitting final customers. In addition, the CER is required to monitor to identify any distortion or restriction of competition in the market. As part of the CER's assessment of this, it is necessary that the CER has information on margins and the components comprising final price. The article of the Directive from which the domestic legislation is transposed is Article 37(1)(j) of Directive 2009/72/EC. The section/subsection which sets out the CER's function in relation to this matter is Section 9(1)(da) of the Electricity Regulation Act 1999 as inserted by Regulation 40(2)(a) of the European Communities (Internal Market in Natural Gas and Electricity) Regulations 2011. Section 9(1)(da) states it is a function of the Commission to "*monitor the level and effectiveness of market opening and the development of competition in the supply of electricity and gas to final customers.*" This section also gives a list of examples of the types of monitoring that would fall under this but specifically states that the monitoring "is not limited" to such examples.

Why the information is beneficial

It is the responsibility of CER to monitor end-user prices. This can involve both the level and trend in end prices, which involves the analysis of the components of end-user price. Nevertheless, the CER has again reviewed the breakdown of data required and has made alterations to the indicator in this decision. The CER would emphasise that while the monitoring of the development of competition is still of utmost importance in deregulated markets, there is a requirement for more enhanced ongoing monitoring of such to ensure that customers are benefitting.

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[http://www.cer.ie/docs/000885/Market%20Monitoring%20in%20the%20Electricity%20and%20Gas%20Retail%20Markets%20Consultation%20Paper\(CER13302\).pdf](http://www.cer.ie/docs/000885/Market%20Monitoring%20in%20the%20Electricity%20and%20Gas%20Retail%20Markets%20Consultation%20Paper(CER13302).pdf)

The CER must maintain effective sight of market activity to ensure that prices are fair and reasonable and that there is transparency in the market. As to margins, the CER wishes to reiterate that it is not suggesting that margins should be at a particular level. The CER understands that varied corporate strategies and performance will result in different margin levels. The objective of the indicator is to inform the CER as to how competition is developing through the analysis of the components that comprise end-user price and the aggregate retail margin. The components of end price will assist the CER in determining more accurately what factors influence price changes.

The CER notes again that ERGEG considers that assessing retail margins based on end-user prices and wholesale prices could be an insightful ad-hoc extension to the end-user price indicator. While data on retail margins may not be collected in the same format in other EU markets, this does not undermine the case for collecting such data.

This framework decision outlines all the indicators that the CER will collect from suppliers and networks on an ongoing basis to ensure it has effective sight of market conditions. Within this decision, the CER has committed to continuing to use 'established tools' to monitor competition such as market share and switching. Such indicators will continue to feature prominently in the CERs retail market monitoring work.

The CER considers that it is important not to monitor any indicator in isolation and the CER will assess margin information alongside other indicators, such as end-user price and the more qualitative indicator of diversity of contracts, as part of the process of examining if competition is benefitting customers. The CER is of the view that it is necessary to analyse other information alongside price data to ensure that trends can be interpreted accurately and the CER would stress again that it does not deem it prudent to wait until market issues arise before collecting data on this key indicator.

The CER notes that a number of respondents raised concerns regarding the allocation of costs and some suggested that new systems would need to be developed to segregate such costs into different sub-segments of each market in the manner proposed in the consultation. As part of the consultation question, the CER had requested that respondents provide information on alternative methods for collecting the information that is required. While the CER did not receive alternative measures for the retail margins indicator, it has decided to reduce the level of detail and has altered the categories to be reported.

With regard to the publication of data collected under this indicator, the CER has decided not to publish this data

Commercial Sensitivity

In relation to concerns raised regarding commercial sensitivity, in dealing with information of a confidential nature, Section 13 of the Electricity Regulation Act 1999 applies which prevents the disclosure of confidential information unless

authorised by the Commission. However, if a request is made for information, the Commission is bound by the Freedom of Information Acts 1997 & 2003 which does not allow the publication of confidential information except where it is in the public interest. The Commission is required to address freedom of information requests on a case by case basis³⁶. In the event of an FOI request, as discussed in the consultation paper, the CER is obliged to comply with the requirements of the Freedom of Information legislation, which has provisions for information that is considered commercially sensitive.

The CER understands that consumers may value other features of an offer rather than solely price. For this reason the diversity of contracts is required to capture all qualitative and quantitative features of contracts and the decisions that customers are making. In addition to this, the CERs Annual Consumer Survey also captures some qualitative information.

The CER notes the comments in relation to the perceived burden associated with providing data in the format proposed in the consultation and as such as significantly reduced the level of detail required. The CER considers that as this would be an annual requirement, the burden is limited.

Consultation Proposal 17: Arrears and Payment Plans

Summary of Respondents Comments

Six respondents commented on the arrears proposal (Bord Gáis Energy, the EAI, SVP, Electric Ireland, Energia and Vayu).

SVP welcomed the proposals on arrears and payment plans as they considered that this information is core to providing an understanding on financial hardship in the market. SVP stated that this data would help uncover the levels of energy debt and fuel poverty. SVP suggested a range of additional indicators which could assist in the analysis, including: profile of successful and unsuccessful payment plans; historic arrears of lifestyle prepayment meter customers. SVP considered that more up-to-date granular data would help develop more targeted interventions. SVP also suggested the analysis of the equalised billing customers to determine its accuracy as a budgeting tool.

Bord Gáis Energy raised concerns over the monitoring of arrears. In particular, they raised a question on the usefulness of the indicator for retail market outcomes. It was considered that the disclosure and publication of arrears would prejudice the commercial position of a supplier and create anti-competitive effects. Bord Gáis Energy and Energia suggested that the information is commercially sensitive. Bord Gáis Energy considered that there is no reference to arrears in legislation and the EAI also questioned the CER's legal powers to examine arrears information.

Electric Ireland raised a number of issues with regard to arrears. It suggested that there are a number of factors outside the control of energy supply companies

³⁶ For more information, see <http://www.foi.gov.ie/>.

that influence the level of arrears. While Electric Ireland understood the importance of arrears information to inform customer protection policy, it did not agree with the reporting of monetary values and among the identified reasons for this, it states that the publication of this information could lead to cherry picking approaches by new market entrants.

Vayu considered that the arrears data should cover the non-domestic category as a whole, without a breakdown of business sub segment as a specific IT system would need to be developed to categorise customers.

CER's Response to Comments

The CER welcomes the responses to the arrears proposal.

Regarding the points raised by Bord Gáis Energy, the CER wishes to clarify that data on arrears will not be published at supplier level. The CER will publish data at an aggregate level and considers that this will not be detailed enough for potential new entrants to cherry-pick as suggested by Electric Ireland. Nevertheless, the CER will consider the necessity of publication when the first data reports are submitted. While in this decision the CER is broadening out the breakdown of the domestic category to include the urban, rural, day-night and 24 hour meter breakdown (after consideration of an earlier SVP comment), the CER commits to publishing data on the domestic category at a broad level without the separation of PAYG, urban/rural or day-night/ 24hour customers.

While 'arrears' is not specifically stipulated, legislation states that the CER's market monitoring activity is not limited to the areas identified. The CER can collect other market monitoring data that it considers to be important in order to determine if customers are benefitting from competition and to identify any distortion or restriction to competition. The CER considers that information on arrears and payment plans can help in informing customer protection policy and together with the indicator on disconnections (and PAYG meter installs) gives a clearer picture of the number of customers facing difficulty. The number of customers in arrears and with bad debt can also impact on the tariffs suppliers offer, requiring larger deposits and possibly having an impact on all tariff rates. Information on arrears and payment plans is vital to inform customer protection policy. The CER considers that the detail proposed as part of the indicator is at a relatively broad level and as such would not present a burden in relation to reporting.

The CER notes Vayu's comment that the data should just cover the non-domestic segment without the breakdown of business sub-segment. However, the CER notes that customer protection policies are in place for different segments and it is important for the CER to monitor all segments to help determine if there may be a need for altered or extended supports.

The CER welcomes SVP's support for this indicator. In light of the points raised in the SVP response, the CER has extended the payment plan indicator to include the number of broken payment plans per customer before disconnection

and the number of successful payment plans. The CER has also extended the indicator to include data on the value of average weekly repayments and the spread of weekly repayment levels. The CER considers that as payment plans are an important feature of customer protection policy, it is necessary to monitor how effective these plans are in alleviating debt and supporting customers in difficulty. The CER has added the aforementioned units to the indicator and notes that it will not publish this data at supplier level. The CER considers that suppliers should already be monitoring such data to ensure that plans are effective and to comply with codes of practice requirements. With regard to equalised billing, the CER considers that such data could potentially be extracted from Consumer Surveys and the CER will consider this for the next survey.

Consultation Proposal 18: Contract Breakage Penalties

Summary of Respondents Comments

There were three responses to this question. Bord Gáis Energy and Electric Ireland agreed with the contract breakage fee proposal.

Energia suggested that it is unclear how the CER will achieve its objectives for measuring this indicator. It is suggested that some customers may decide to deliberately incur the penalty to avail of a better rate from another supplier. Energia suggest that the CER proposal characterises customers are lacking awareness and that this may not be the case.

CER's Response to Comments

The CER welcomes the responses to this proposal.

In response to Energia's comment, the CER recognises that some customers may decide to incur a penalty if there is a better offer available from another supplier. While this information could be used in conjunction with other available information to determine if an issue exists, the CER will not request regular reports on penalties from suppliers but may do so on an ad hoc basis.

Consultation Proposal 19: Customer Complaints

Summary of Respondents Comments

Bord Gáis Energy welcomed the reduction in the detail proposed as part of this indicator compared to the 2011 proposal, however suggested that more detail was required to explain what type of complaint will be included in each category, e.g. meter issues. Bord Gáis Networks also requested more information on each category. Bord Gáis Energy and Bord Gáis Networks suggested that 'billing issues' as a category is not relevant as a network category. Bord Gáis Energy noted that safety complaints are not within the networks categories and asked for clarification as to whether or not they will be captured within the Safety Framework for Network companies or within retail monitoring. Bord Gáis Energy suggested that 'other issues' should not be required as specific categories should be developed only. Bord Gáis Energy also suggested that Meter issues category

should not be included as a supplier category as suppliers do not own the meters and are therefore not responsible for resolving customer complaints. They suggested the separation of 'marketing/sales issues' and the inclusion of prepayment meter issues and credit management issues as separate categories. Bord Gáis Energy also suggested that the measurement of network complaints cannot take place until there is a market message in place to record complaints.

SVP agreed with the inclusion of complaints as an indicator.

ESB Networks considered that the proposals were adequate and the current complaints list can be extended to include the new categories.

Electric Ireland stated that it remains concerned at the level of detailed data collection in the revised proposal. In particular, Electric Ireland considered that it would be a challenge to record all forms of complaint. Electric Ireland stated that judgment will be required in certain instances to determine if a customer is making a complaint or a general enquiry.

Energia suggested that it is unclear why the proposal is to collect data for all customer categories when legislation stipulates the monitoring of domestic complaints. They also suggest that it is still unclear what a complaint is. Given the proposal covers non-valid complaints, Energia suggests that it will be difficult to ensure a single approach for measurement across suppliers. They also raise concerns in relation to the cost to implement and suggest that the best method to measure complaints is through customer surveys.

CER's Response to Comments

The CER welcomes the comments received in relation to the complaints indicator.

With regard to BGEs suggestions, the CER has altered the sub-categories to reflect the suggestions made. The definition of each sub-category will be considered as part of the implementation process.

As to Electric Ireland's concern, the CER considers that some judgment will be required in compiling this information but is keen to keep to the proposed measure as identified by ERGEG.

In relation to Energia's comments, the CER considers that data on complaints from supplier companies is of value and would allow for a more robust analysis of the level of customer satisfaction. The CER in its consultation paper had cut back significantly on the level of detail proposed as part of this indicator and considers it imperative that it monitors complaints from all customer categories to gauge satisfaction across all customer types. The CER would consider that some systems are already in place to address formal complaints and that this can be extended to achieve the necessary reporting detail. The CER would note that it already collects some data on complaints through its Consumer Survey and the proposed data would complement the data that is gathered through this Survey, and also the monitoring of complaints received by the CER's Energy Customer Team (both of which will continue to be produced).

Consultation Proposal 20: Customer Enquiries

Summary of Respondents Comments

Electric Ireland accepted the enquiries proposal.

Bord Gáis Energy welcomed the reduction in the detail proposed for the enquiries indicator. However, Bord Gáis Energy suggested that the frequency of submissions should be changed to annual as the level of activity remains steady throughout the year. Bord Gáis Energy also stated that they assume enquiries means the number of calls received in the call centres.

Both Bord Gáis Energy and Energia suggested that better insight on 'enquiries' could be taken from the use of current customer surveys.

Energia suggested that it is not possible to conceive a clear definition of enquiry and to determine how such can be captured. They state that there is no system in place for capturing such data and a system would be costly to introduce.

CER's Response to Comments

The CER welcomes the comments on customer enquiries. The CER considers that the main aim of this indicator is to identify any areas where further steps may be necessary to improve the information available to the customer so that they easily understand their options and rights. While this is the case, the CER takes on board the issues raised in the responses and will not require data on enquiries. The CER will continue to utilise current surveys, however, would suggest that suppliers should monitor all forms of interaction with customers.

Consultation Proposal 21: Other Proposals

Summary of Respondents Comments

Bord Gáis Energy agreed with the proposal. Electric Ireland suggested that the proposed set of market monitoring indicators may act against market innovation and both Electric Ireland and Energia suggest that the framework will act as a barrier to entry and against market innovation.

Energia considered that the issue of wholesale market liquidity is of central importance to retail market outcomes and that is it unclear where this is measured already in the CER. Energia suggested that there are liquidity issues and that the measurement of liquidity should be prioritised.

CER's Response to Comments

The CER welcomes the comments received.

The CER understands the concerns raised by Energia. The CER recognises the importance of wholesale market liquidity in terms of retail outcomes and will consider such in its future work.

Consultation Proposal 22: De Minimis Threshold for Suppliers

Summary of Respondents Comments

Three respondents commented on this proposal. Electric Ireland was in agreement with this proposal.

Vayu considered the 1% threshold is too low as no entity with this level of market share could influence the market or prices. Vayu suggested 5% as a more reasonable threshold. Vayu also requested clarification as to why 4 as the minimum number of customers was proposed and suggested that it should align with the EU figure of 3 customers. In addition, Vayu also requested clarification on why consumption was used as a threshold in electricity but customer numbers in gas.

Energia also suggested that the de minimis threshold is too low and the new framework may act as a barrier to entry. They suggest that more information on the rationale for the threshold is required.

CER's Response to Comments

The CER welcomes the comments received.

The CER does not consider the 1% as too low and suggests that a supplier with 1% of all customers should be monitored to ensure that the customers associated with it are protected. The CER is required to monitor retail markets and information on smaller suppliers can assist in such. The CER is not suggesting that such suppliers can influence market outcomes.

Annex 3 Supplier Forms

Draft example suppliers reporting forms:

Monthly Forms

Dual fuel switching

"losing supplier"	Dual fuel switching		
"Year" "month"	Electricity	Gas	Both electricity & gas
Number of switches from supplier			

Renegotiations

"supplier"	Electricity			Gas		
"Year" "month"	Domestic	PAYG	Small business	Domestic	PAYG	IC
Number of Renegotiated contracts						
Number of customers contacting to renegotiate						

Quarterly Forms

Diversity of contracts –separate forms for gas, electricity, and domestic and small business/IC

"Year" "mth"		Rate information, ex VAT				Features						Customers & consumption				Avg Bill
Name of plan	Legacy plan y/n	Unit rate	Annual SC	Service charge	Other Charge	Contract term	Direct debit y/n	Ebill	Dual fuel	Penalty clause	Other-specify	Total customers	Vulnerable	PAYG	Total mWh	Avg annual bill
Name #1																
Name #2																
Name #3																
Average		Average	Average		Average	Na	Na	Na	Na		Na					

End user price, Arrears and Payment Plans

"supplier"	Electricity					Gas				
"mth" "yr"	Domestic	PAYG	Small business	Medium business	LEU	Domestic	PAYG	IC	FVT	RTF
End User Price										
Total Revenue										
Total Customers										
Total Consumption (MWhs)										
Arrears										
Total value										
Number of customers in arrears										
Customers in arrears for <30 days										
Customers in arrears for <60 days										
Customers in arrears for <90 days										
Payment Plans										
Customers on payment plans										
Number breaking payment plans										
Number of payment plans successfully completed										
Value of average weekly repayment										
Average number of broken payment plans per customer before disconnection										

Annual Forms

Active Suppliers

Year	Electricity					Gas					Dual Fuel
Active in market (y/n)	Domestic	PAYG	Small business	Medium business	LEU	Domestic	PAYG	IC	FVT	RTF	
Mth 1											
Mth 2											
Mth 3											
Mth 4											

Defaulting to standard tariff

"supplier" "Year"	Electricity			Gas		
Number of customers Defaulting to standard tariff	Domestic	PAYG	Small business	Domestic	PAYG	IC
Quarter 1						
Quarter 2						
Quarter 3						
Quarter 4						

Retail margins

"supplier"	Retail margins	
"year"	Electricity	Gas
Total Revenue, € (all forms)		
Total Energy purchases, €		
Domestic total		
Non-domestic		
Total Network & Non-Opex related costs, €		
Supply Costs (opex), €		
Domestic total		
Domestic PAYG		
Non-domestic		
Supplier margin (earnings before interest and tax), €		
Domestic total		
Domestic PAYG		
Non-domestic		

Customer complaints

"supplier"	Customer complaints – number of complaints							
	Electricity				Gas			
"quarter, year"	Domestic	Small	Medium/	LEU	Domestic	IC	FVT	RTF
Billing								
Payment (i.e. charges payment direct debit, price, refunds)								
Marketing								
Sales								
Customer Service								
Meter read issues								
Account Issues								
Switching issues								
Prepayment meter issues								
Credit management issues								
Other								

Annex 4 Headings for Network Reports

The following tables show the indicative headings to be contained in the network data reports. Networks can set up the reports in any way once these headings are contained within the reports.

Switching Requests

Period	Supplier	Number of Switching requests received					
		<i>Total Domestic</i>	<i>Domestic of which PAYG</i>	<i>Small business /IC</i>	<i>Medium /FVT</i>	<i>Large / RTF</i>	<i>Total requests</i>

Completed Switches

Period	Supplier	Number of Customer Gains (switching)					
		<i>Total Domestic</i>	<i>Domestic of which PAYG</i>	<i>Small business /IC</i>	<i>Medium /FVT</i>	<i>LEU / RTF</i>	<i>Total Gains</i>

Period	Supplier	Number of Customer Losses (switching)					
		<i>Total Domestic</i>	<i>Domestic of which PAYG</i>	<i>Small business /IC</i>	<i>Medium /FVT</i>	<i>LEU / RTF</i>	<i>Total Losses</i>

Period		Total number of switches					
		<i>Total Domestic³⁷</i>	<i>Domestic of which PAYG</i>	<i>Small business /IC</i>	<i>Medium /FVT</i>	<i>LEU / RTF</i>	<i>Total Switches</i>
	<i>Total Completed Switches</i>						
	<i>Proportion that were a CoLE</i>						

Repeat Switching excluding CoLE

Period	Number of Repeat Switches					
	<i>Total Domestic</i>	<i>Domestic of which PAYG</i>	<i>Small business /IC</i>	<i>Medium /FVT</i>	<i>LEU / RTF</i>	<i>Total number of repeat switchers</i>

Delayed/failed Switches

Band	Supplier	Number of Delayed switches					
		<i>Total Domestic</i>	<i>Domestic of which PAYG</i>	<i>Small business /IC</i>	<i>Medium /FVT</i>	<i>LEU / RTF</i>	<i>Total Delayed</i>

New Connections

Period	Supplier	Metric	Number of New Registrations				
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³⁷ DG 1-1, 1-1, 2-1 and DG 2-2 breakdown in electricity.

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			Total Domestic	Domestic of which PAYG	Small businesses /IC	Medium /FVT	LEU / RTF	Total New registrations
		New registrations						
		Proportion that are reconnections						

NPA Disconnections

Period	GPRN/MPRN	Supplier (billed)	Supplier (current)	Market segment	Geographic location
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Incomplete NPA Disconnections

Period	GPRN/MPRN	Supplier	Market segment	Reason for failed disconnection
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Time to Reconnect – domestic market

Period	GPRN/MPRN	Date of Disconnection	Date of Reconnection	CoLE on reconnection
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PAYG meters installed

Period	GPRN/MPRN	Supplier	Geographic location
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PAYG customers reverting to credit

Period	Supplier	Lifestyle Choice	Financial hardship	Geographic location
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Debt flags raised

Period	Supplier (losing)	Market segment	Number of debt flags raised	Proportion of CoS requests for period
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Debt flags cancelled/ accepted

Period	Supplier (gaining)	Market segment	Number of debt flags cancelled	Number of debt flags accepted
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Market Share

Period	Supplier	Market segment (include Vulnerable, PAYG as subset domestic)	Number customers ³⁸	Consumption (MWhs/ GWhs) ³⁹
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Market Share - Eurostat

Period	Supplier	Eurostat Bands	Number customers	Consumption (MWhs/ GWhs)
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Customer Complaints

Period	Supplier	Category	Number customers
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³⁸ DG 1-1, 1-1, 2-1 and DG 2-2 breakdown in electricity.

³⁹ DG 1-1, 1-1, 2-1 and DG 2-2 breakdown in electricity.

Annex 5 Adherence to Principles of Good Regulation

The Government White Paper on Regulating Better defined the following six principles of good regulation:

- **Necessity** – Is this regulation necessary? Can we reduce red tape in this area? Are the rules and the structures that govern this still valid?
- **Effectiveness** – Is the regulation properly targeted? Is it going to be properly complied with and enforced?
- **Proportionality** – Are we satisfied that the advantages outweigh the disadvantages of the regulation? Is there a smarter way of achieving the same goal?
- **Transparency** – Have we consulted with stakeholders prior to regulating? Is the regulation in this area clear and accessible to all? Is there good back-up explanatory material?
- **Accountability** – Is it clear under the regulation precisely who is responsible to whom and for what? Is there an effective appeals process?
- **Consistency** – Will the regulation give rise to anomalies and inconsistencies, given the other regulations that are already in place in this area? Are we applying best practice developed in one area when regulating other areas?

The following table outlines each indicator in this Decision and how each adheres to the principles of Better Regulation.

	Necessity	Effectiveness	Proportionality	Transparency	Accountability	Consistency
Overall Market Monitoring Framework	CER required by legislation to monitor effectiveness of market opening & development of competition. Current indicators to continue to be collected but new indicators required to comply with legislation and enhance current monitoring in context of deregulated markets.	CER's powers to request information outlined in licences. Each indicator will assist the CER assess competition & investigate if customers are benefitting.	This Decision was developed following two consultation papers and has taken account of the views in the responses to the consultation. The 2013 consultation requested respondents to highlight alternative proposals to deliver the same benefit, however alternatives were proposed.	This Decision was developed following two consultation processes and has taken account of the views in the responses to the consultation. Workshop with industry has also been undertaken. Data will be published (with some limits) & analysed by CER.	Data is to be received from networks & suppliers. Analysed objectively by CER and published (with some limits).	Some indicators currently reported and other indicators added for robustness. ERGEG best practice guidelines referenced when developing the framework.

Indicator	Necessity	Effectiveness	Proportionality	Transparency	Accountability	Consistency
Switching indicators	Required by legislation. Currently collect some data. New indicators requested for robustness. Competitiveness indicator.	Provides clear & simple measures of consumer activity & competition. Help identify if there may be an issue.	Supported by respondents- no alternative suggestions.	Consulted on. Publication of data by the CER.	Data received from networks. Analysed objectively by CER & published.	Same as current reporting, with added indicators for robustness.
Renegotiations	ERGEG indicator. Necessary to effectively monitor customer engagement. CER duty to protect customers. Competitiveness indicator.	Complements the switching data to give a more complete picture of customer engagement. Data to be submitted by all suppliers.	Supported by respondents. No alternative suggestions that would achieve same goal.	Consulted on. Publication of data (with some limits) by the CER.	Data received from suppliers. Analysed objectively by CER & published.	Provides a more complete picture of cust engagement. Suppliers don't submit data at present but CER does not perceive there to be a large burden associated with the requirement. ERGEG indicator.
Connections	ERGEG indicator. Currently collect some data. Necessary to monitor activity in the markets. Indicator of market activity, customer awareness & protection.	Measures new connections. Monitor new activity in the market & service provided to customers.	Supported by respondents. Annual publication by CER.	Consulted on. Publication of data by the CER.	Data received from networks (suppliers). Analysed objectively by CER & published.	Consistent with current reporting.
Disconnection rates	Required by legislation. Currently collect some data. Necessary to inform customer protection policy.	Data on NPA disconnections by customer & geographic area, PAYG meters. Inform customer protection policy.	In line with current reporting. Publication and internal reporting.	Consulted on. Publication of data by the CER.	Data received from networks. Analysed objectively by CER & published.	Enhanced current indicator.
Debt flagging	Monitor debt flagging process. Currently collect some data. Necessary to monitor effect of initiative.	Indicators on debt flags raised, debt flagged CoS rejected. Monitors effectiveness of process.	In line with current reporting. Publication and internal reporting.	Consulted on. Publication of data (with some limits) by the CER.	Data received from networks. Analysed objectively by CER & published.	Consistent with current reporting.
Market share & active	Required by legislation. Currently collect some	Measured by customer numbers,	Supported by respondents.	Consulted on. Publication of	Data received from networks	Consistent with current reporting. Few pieces of

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Indicator	Necessity	Effectiveness	Proportionality	Transparency	Accountability	Consistency
suppliers	data. Key competition indicator & necessary to describe market.	consumption, active suppliers. Key competition indicator.	Publication and internal reporting.	data by the CER.	(suppliers). Analysed by CER & published.	additional data required.
Retail margins	Legislation requires CER to monitor end-user prices. ERGEG states monitoring of retail margins is useful & at discretion of NRAs. Necessary for CER to understand the composition of final prices & the reasons for price changes which impact on final customers.	Data on revenue, generation, network costs, supply cost, retail margin. Necessary for CER to understand the composition of final prices & the reasons for price changes which impact on final customers.	Already reported by suppliers in regulated accounts but not by customer category, no perceived significant extra burden. No alternative suggestions that would achieve same goal.	Consulted on. Proposed standard form to be developed for all suppliers to fill.	Data received from suppliers. Analysed objectively by CER & aggregate data published.	Support other indicators in providing CER with a complete picture of competition. Suppliers don't submit data at present but CER does not perceive there to be a large burden associated with the requirement.
Diversity of tariffs, contracts, price spread	Legislation requires CER to monitor end-user prices. Key measure of customer options & competition. Breakdown suggested allowing for accurate robust analysis & comparison, not just focusing on actual rates.	Includes tariff description, customer numbers, consumption. Key measure of customer options & competition.	Already reported to some extent by suppliers on websites, no perceived significant extra burden. No alternative suggestions that would achieve same goal. Publication and internal reporting.	Consulted on. Publication of aggregate data by CER. Proposed standard form to be developed for all suppliers to fill.	Data received from suppliers. Analysed objectively by CER & aggregate data published.	Suppliers don't submit data at present but CER does not perceive there to be a large burden associated with the requirement. Support other indicators in providing CER with a complete picture of competition.
End user prices	Legislation requires CER to monitor end-user prices. Key measure of customer options & the prices that are being charged. Informs customer protection policy.	Measured by average end-user price. Key measure of customer options & the prices that are being charged. Informs customer protection policy.	Already reported by suppliers to SEAI, no perceived significant extra burden. No alternative suggestions that would achieve same goal.	Consulted on. Publication of aggregate data by CER. Proposed standard form to be developed for all suppliers to fill.	Data received from suppliers. Analysed objectively by CER & aggregate data published.	Support other indicators in providing CER with a complete picture of competition. Suppliers don't submit data at present but CER does not perceive there to be a big burden associated with the requirement
Arrears &	Help identify reason for	Measured by the	Necessary to inform	Consulted on.	Data received	Support other indicators in

Indicator	Necessity	Effectiveness	Proportionality	Transparency	Accountability	Consistency
payment plans	trends in other indicators. Informs customer protection policy. Necessary given increase in number of customers in arrears. Ensure processes in place are working for customer.	number of customers in arrears and in payment plans, including the number breaking payment plans & average payment plan rate. Provide necessary input on customer protection policy.	CER customer protection policy, No perceived significant burden as suppliers are already aware of the number of customers in arrears & on payment plans as required by Supplier Handbook. Publication and internal reporting.	Publication of aggregate data by CER. Proposed standard form to be developed for all suppliers to fill.	from suppliers. Analysed objectively by CER & aggregate data published.	providing CER with a complete picture of competition. Suppliers don't submit data at present but CER does not perceive there to be a large burden associated with the requirement given the requirements on suppliers in the Supplier Handbook. Publication, aggregate only.
Customer complaints	Required by legislation. Need for breakdown to allow for meaningful analysis.	Number of complaints broken into subcategories. Measures outcome for customers & engagement, competition.	Necessary to inform customer protection policy. Publication & internal reporting.	Consulted on. Publication of data by CER. Proposed standard form to be developed for all suppliers to fill.	Data received from suppliers. Analysed by CER & aggregate data published.	Consistent with what is required in legislation. Support other indicators in providing CER with a complete picture of competition.