



**Response by Energia to Commission for
Regulation of Utilities**

*Electricity and Gas Suppliers' Handbook 2021
Consultation Paper
CRU21122a*

10 December 2021

1 Introduction

Energia welcome the opportunity to respond to the Commission for Regulation of Energy Utilities' consultation CRU21122a on Electricity and Gas Suppliers' Handbook 2021 Consultation Paper. Smart metering is an important mechanism to facilitate the participation of all consumers in the energy transition and an important pillar of the Clean Energy Package, which Energia is keen to see rolled out effectively. The first section of our response consists of an overarching response to the consultation. The second section contains Energia's response to the specific consultation questions.

2 Overarching response

2.1 Definition of Smart PAYG

Energia supports introducing a bespoke Smart PAYG code of practice (COP) on the grounds that it would be applicable only to suppliers offering Smart PAYG products via the Central Market Systems (CMS). Smart PAYG facilitated via the CMS should therefore be defined in the handbook so as to distinguish the product type from any others offered in the market (which may not for example rely on the CMS). Suppliers should remain free to introduce new and innovative product types. Failing to clearly define what a Smart PAYG product is, creates a risk that suppliers might have to comply with a standard that may not be appropriate for a product they wish to develop with similar but distinct characteristics to a Smart PAYG offering.

2.2 Timeline for Implementation

The market changes necessary to allow Smart PAYG products to operate via the CMS, will not be delivered until after the Version 14 release has been completed. It would therefore seem reasonable to wait until the completion of the Version 14 release, until suppliers become obliged to comply with the requirements outlined in the new Smart PAYG code of practice. This would provide suppliers with an additional 9 months, to make the necessary system changes, which would be welcome given the workload involved in this phase of the NSMP.

3 Consultation Questions

3.1 Consultation Question 1: Do you think the inclusions for the Smart PAYG code of practice are appropriate and sufficient. If not, please detail what inclusions you believe should be made and why.

Energia have the following feedback regarding the proposed Smart PAYG code of practice:

3.1.1 General - Section 9.1

As per our comments in section 2.1, we believe the Smart PAYG CMS solution should be defined in the handbook and other product offers in the market. The Smart PAYG COP should therefore stipulate that it applies only to the Smart metering solution rolled out as part of the National Smart Metering Plan infrastructure.

3.1.2 Prepayment Hardship Services – Section 9.2

The circumstances under which a customer can be deemed to be in financial difficulty and or financial hardship are quite varied. While Energia recognise that it can be useful to provide a threshold amount for what constitutes a customer in financial hardship, our preference would be for a broader definition of Financial Hardship, that would facilitate suppliers acting at an early stage in the process - before a customer has the opportunity to rack up such a level of debt – if necessary. Every case of hardship is different, and our experience is that different customers have vastly different interpretations of when they might deem themselves to be in financial hardship. Energia's suggestion would therefore be that the language in the footnote to 9.2.1 could be amended to provide a more illustrative example of what a financial hardship could be deemed to be, but clarify that customers and their suppliers ultimately have the ability to discuss and organise the installation of the financial hardship meter by mutual agreement.

3.1.3 Debt Flags.

Energia's understanding is that it is an obligatory requirement for suppliers to raise debt flags once a customer's debt exceeds the prescribed threshold. One potential implication of this requirement is that Financial customers wishing to switch to a supplier who operates a prepayment service might be rejected by an incoming supplier on the grounds that a debt flag is raised. Consideration might therefore be given to providing an alternative flag that would distinguish this type of switch from any other type of customer who has debt on their prior account. Otherwise there is a risk that customers seeking to avail of a prepayment meter might perceive their options to be limited, if they have a request to change supply rejected.

3.1.4 Customer Messaging – Section 9.3

In relation to section 9.3.1 that the provision of such regular messages will require the availability of up-to-date data, which will require that ESNB provide more frequent data and as such would ensure that suppliers are able to provide the customer with their most up to date balance.

Energia notes that section 4.3.2 of the Handbook states that; *"Suppliers may provide a choice of payment methods which must include one or more of the following categories: a. Electronic Funds Transfer; b. Postal; c. Over the counter e.g., Pay point, Post Office; d. Cash."* However, section 9.3.2 of Handbook stipulates that the Supplier must provide the facility for cash payments and feel this should be removed. Energia requests that CRU provide clarity and guidance here on how this is to be facilitated. It is our understanding that the current Smart pre-payment method may not have An Post or Payzone option, as these are facilitated by pay as you go top up cards. Any cash payment method must also take into consideration the associated service level that can be achieved for the reconnection time.

3.1.5 Disconnection and Reconnection – Section 9.4

Energia would request that the wording in 9.4.2 is amended to remove the word "total". The total time to reconnect is completely out of the supplier's control. Any service level that is dependent on third parties needs to be taken into account when setting the reconnection time. Energia would emphasise here that the Smart PAYG solution, should where possible automation where logic can be introduced to facilitate a modern

Smart PAYG solution. Such a solution would provide a smoother customer experience where disconnection occurs. Otherwise, consideration needs to be given to the smart PAYG network solution and what reconnection time it is capable of providing in addition to the service level that a supplier must meet.

Energia would also suggest that consideration be given to mitigating circumstances where reconnection is in excess of the target timelines. For example, issues with payment provider processing times; market messaging in the event of a market outage. Out of hours support will need to be considered for suppliers to assist customers in certain scenarios too.

Contained within this proposed handbook are SLAs and requirements that suppliers will only be capable of fulfilling by relying on the DSO or a third party (such as a payment provider). Customers are typically well versed on the requirements of the supplier handbook and it is therefore important that suppliers are not held to a standard that they do not entirely control all of the process requirements.

- As the Handbook requirements only apply to licensed Suppliers, any stipulated reconnection timeline should cover supplier actions only and not the full reconnection timeline.

Further detail is outlined in response to the specific consultation questions below.

3.2 Consultation Question 2: Do you agree that the specific Universal Design Irish Standard I.S. 374:2019 is referenced. If not, please explain why.

Energia have no specific comments in relation the Universal Design Irish Standard I.S. 374:2019.

3.3 Consultation Question 3: The CRU invites comments from interested parties on these editorial amendments.

Energia we would welcome clarity on target timelines, responsibilities, and processes for CRU completing such reviews, which could be included in the Handbook or a separate guidance note for suppliers.