

Respondent Details	
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**Action for Warm Homes**

No.	Question	Your response	Consent to Publish Response (Y/N)
Q1	What are your views on the suitability of the proposed GSS standards? (These are summarised in column 3 of Table 3 in the Consultation Paper)	<p>NEA is particularly pleased about the review and implementation of the revised GSS and we commend the Regulator for getting this in place. These standards were last updated in 1999 and it is therefore right that they should be reviewed and brought into line with the rest of the UK. With over 700,000 domestic customers in Northern Ireland paying approximately 25% of their electricity bills towards network costs, it is only fair and right that customers have guaranteed standards in place.</p> <p>We also note that whilst the Gas GSS is currently under review, having a set timeframe to review all GSS should be adopted. It is essential that all customers are aware of their entitlements available through GSS and have easy access to them. The significance of the standards are for households in crisis, and while fortunately major incidents are uncommon, it is commensurate to have suitable and up to date standards in place. The customer pays for the infrastructure and this is an important issue that the Utility Regulator (UR) should be reinforcing.</p>	Y
Q2	Are the prescribed time periods for the guaranteed standards in column 3 of Table 3 in the Consultation Paper appropriate?	Any interruption in electricity supply can cause unwanted inconvenience and distress particularly for those who are vulnerable. Heating, freezer facilities and communications for example, are vital services and any of these not being available can cause major inconveniences and expense if an interruption to supply is more than a few hours. It stands to reason that an ethos of <i>the sooner the better</i> is appropriate for reconnection standards. NEA believe that any improvement in standards is good, however, DNOs should always be striving to improve standards.	Y
Q3	Do you regard the proposed compensation payment values companies must make in the event of a failure to deliver the guaranteed standards (in column 3 of Table 3 of the Consultation Paper) as appropriate? (a) If not, which values should be higher/lower?	<p>Yes, we welcome the proposed increases to the payment values. As outlined above, interruptions to supply can have a major impact on households, yet we realise that compensation payment values 'do not reflect or attempt to remedy the actual loss experienced by each customer, in the unique circumstances of every case.'</p> <p>We are slightly confused about who, and in what circumstances ex gratia payments are made, and we therefore seek further clarification from the UR on this issue.</p>	
Q4	Do you agree with our proposals on how compensation payments are provided, either automatically, or with the customer having to submit a claim? (a) for Critical Care Register and vulnerable customers; (b) for all other customers.	In the GSS, it seems there are two categories of vulnerable customers: those on the critical care register and those deemed vulnerable due to pension age or disability/sensory impairment. We seek clarity on how these customers are categorised and if they are kept on two separate databases, as there may be an overlap with many belonging to both groups. We also question the decision to only make automatic payments to these groups, why not provide automatic payments for all eligible customers if the IT infrastructure and data is already in place? The procedure for making a claim doesn't seem to be obviously set out on the DNO website; it would make sense to apply a blanket policy for all customers affected by outage. We also suggest a widespread awareness raising campaign for eligible customers to sign up to the critical care register; this could be delivered in partnership with trusted intermediaries. We note on Page 28 section 4.8 that the regulator has committed to review the network companies Critical Care Registers and are interested in what stage this is at and any likely timescales. Should there also be a target to promote this further?	Y
Q5	Do you agree with our proposals to reduce the supply restoration period from 24 hours to 18 hours in normal weather conditions?	Yes, we agree with all proposals and refer to the answer below.	
Q6	What are your views on re-evaluating the 18 hour supply restoration period in normal weather conditions at a future date, with a view to reducing the period from 18 hours to 12 hours to align with the GB GSS? (a) at what stage would this reduction be appropriate?	We agree that the 18 hour target re-evaluation should take place, and recommend reducing the restoration period to 12 hours to align with the current standard in GB with a phased approach over 5 years from implementation.	

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Q7	Do you agree with our proposals that where there is a single fault in the distribution system affecting 5,000 customers or more, that the prescribed period for supply restoration by the distribution company should be 24 hours?	Yes.	Y
Q8	Do you agree with our proposal to introduce a GSS for rota disconnections?	Planned interruptions that occur more than three times are extremely disruptive. It seems customers will face a major barrier having to record and annotate the periods of power outage, and even those on the CCR will be required to keep a note of when these occur. This is an onerous process for anyone. Who is responsible for telling customers to keep a record of any occurrences, and how will the customer know there is a rota disconnection? Also the customer only has one month to make their claim, this should be three months akin to GB.	Y
Q9	Do you agree with our proposal to introduce a GSS for multiple disconnections?	We agree with the UR proposal to introduce a GSS for multiple disconnections. However, the claim year runs based on the financial year, and this potentially could lead to confusion for customers who are not familiar with this time period, or who may have recorded the disconnections based on a calendar year. This could cause customers to face a barrier to making a claim. If the IT infrastructure is already in place to identify householders and to automatically make the payment, this would be preferable.	
Q10	Do you agree with our proposals for Supplier GSS?	Yes	Y
Q11	Do respondents have any comments in regards the consumer impact of the proposed introduction of supplier guaranteed standards of service?	This makes sense as the supplier is the customer's first point of contact. Generally speaking customers do not yet understand the difference between Supplier and Network Operator, and this can lead to confusion. They have a relationship with the supplier that they pay the bill to. It makes sense to ensure that the supplier and DNO have systems and processes in place to communicate with each other that will improve customer services. Will the supplier be in a position to advise customers on the likely timescale of the interruption(s)? And what is the supplier's role in this	Y
Q12	Do you agree with our proposals in relation to distribution companies responding to complaints?	Yes	
Q13	Do you agree with our proposals that supply companies should provide information annually to customers on the GSS arrangements?	Yes, but this alone will not be enough and is only one step towards bringing about awareness of the availability of compensation. There needs as mentioned above, to be a larger scale awareness campaign and ideally a strategy put in place to involve CCNI and the wider advice and information sector who are dealing with customers. Any literature needs to be in plain english and easily read format.	Y
Q14	Do you agree with our proposals to retain the Overall Standards of Performance?	Yes, this should be retained. The OSS has no specific targets or compensation but it is a good practice guidance for suppliers and networks to adhere to.	Y
Q15	Do you agree with our proposals that the distribution company should provide information annually to customers on the overall standards of performance?	Yes, and we are pleased with this proposal as NEA requested that this is inserted in our call for evidence in December 2016.	Y
Q16	Do you agree with our proposals that both supply and distribution companies should report annually on their performance under the GSS regime, including any ex-gratia payments?	Yes, and we are pleased with this proposal as NEA requested that this is inserted in our call for evidence in December 2016.	Y
Q17	Do you agree with our proposals to publish information on company performance on our website?	Yes, and we are pleased with this proposal as NEA requested that this is inserted in our call for evidence in December 2016. Monitoring is a significant issue and the independence of monitoring is key to maintaining standards.	Y
Q18	Do you think that the information provided by companies on GSS and OSS, together with UR publication of figures on performance is sufficient in terms of ensuring consumer awareness of GSS and OSS?	No, it is vital that this aspect is strengthened. NEA calls for more emphasis to be placed on a wide reaching consumer awareness campaign delivered by information and advice organisations, and consumer organisations i.e. NEA, CCNI, the advice sector and Housing sector. There is a need for a strategy on how the information will be given out.	Y

No.	Question	Your response	Consent to Publish Response (Y/N)
Q19	What are your views on the proposed timeframe for implementation of the new GSS Regulations and Overall Standards?	We would like clarification on the time lines as we are unsure if the quarters refer to calendar of financial years.	Y
Q20	What are your views on the implications of this review? (a) Are there any further areas which require consideration, other than those identified in paragraphs 4.122 - 4.125 of the Consultation Paper?	We believe the review is well overdue and are pleased that it will now be implemented.	Y
Q21	Could respondents please provide information and evidence on any likely regulatory and equality impacts of the proposals set out in this paper.	This is a complex area which requires a specific strategy on raising awareness. There should be cross sectoral work carried out in implementing awareness raising throughout the statutory and third sectors. Much of the current information is online - As an example of accessibility, approximately 17% of the population do not use the internet, many of these are older people or people with physical or mental health issues. Advice and Information should take due consideration to Section 75 groups including sensory impairments, learning disabilities and literacy issues.	Y

**Additional Factors- Please complete this section if you consider there are additional issues/ aspects which the UR should consider as part of its review of GSS. Please use one row for each area and use additional rows as required.**

No.	Additional factor area	Reason for consideration and relevant factors	Consent to Publish Response (Y/N)
1	Keeping appointments	It would be useful to include the addition of the GB two hour time band for appointments.	Y
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6			