



The Consumer Council

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Ref: PD20010711

Colin Broomfield
Utility Regulator
Queen's House
14 Queens Street
Belfast
BT1 6ED

Dear Colin,

Re: Harmonised Ancillary Service Arrangements and the Bidding Code of Practice

The Consumer Council is a Non-Departmental Public Body set up in legislation to safeguard the interests of all consumers, and particularly the vulnerable and disadvantaged. The Consumer Council is an independent organisation which operates to promote and protect the consumer interest.

We welcome the opportunity to respond to this consultation on harmonised Ancillary Service Arrangements and the Bidding Code of Practice.

It is the position of the Consumer Council that any change to the regulatory structure of the Northern Ireland Energy Market should only be undertaken if it is in the interest of the consumer. With fuel poverty levels in Northern Ireland at 44 per cent, it is important that the regulatory structures look to minimise the cost of energy to consumers.

The SEM Committee should ensure that consumers do not pay twice for any Ancillary Service element. The Consumer Council would therefore ask the SEM Committee to be mindful that any decisions should be made in the interests of the consumer.

The Consumer Council would like the SEM Committee to give consideration to Option 1 given that it will prevent double-payment of any Ancillary Service element and ensure the most economic efficient outcome. However we believe a full cost-benefit analysis should be carried out on each option and the most cost effective option chosen.

The SEM Committee show preference to Option 2 however the Consumer Council would like assurances that this option will only be undertaken if there are clear and tangible benefits to consumers in Northern Ireland.

The Consumer Council would like the Regulator Authorities and the Transmission System Operators to keep in mind that its primary objective of any decision is to protect the consumer.

I hope that these comments are helpful and are given due consideration. Please contact me if you require any clarification.

Yours Sincerely,

Andrew Murray
Senior Consumer Affairs Officer