



The Consumer Council

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3 September 2010

Ref: PD20010639

Jean Pierre Miura
Utility Regulator
Queens House
14 Queen Street
Belfast
BT1 6ED

Dear Jean Pierre,

Re: SEMO Revenue and Tariffs October 2010 – September 2013

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 the SEMO revenue and tariffs for October 2010 – September 2013.

It is the position of the Consumer Council that any decision about the regulatory structure of the Northern Ireland Energy Market should only be undertaken in the interest of the consumer. With fuel poverty levels in Northern Ireland reaching crisis levels, with one in two households struggling to adequately heat their home, it is important that the regulatory structures look to minimise the cost of energy to consumers.

It is understandable that changes in the allowed revenue may be required for and during the period and the Consumer Council would ask that all proposed changes in the allowed revenue and tariffs are carefully scrutinised and are fully justified by the SEMO before they are agreed by the Regulatory Authorities.

Analysis carried out that is based on forecast data should ensure that the forecasts used take account of the most up-to-date data so as to provide the most robust and accurate analysis.

The Consumer Council believe that only after a robust analysis has been carried out by the Regulator Authorities should changes to costs or additional costs be approved. These alterations should only be approved provided they will result in benefits to consumers, which will ultimately come in the form of lower prices.

The Consumer Council would like the Regulator Authorities and the Transmission System Operators to keep in mind that their 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