

RP7 - NIE Networks Price Control 2025-2031

Final Determination Annex U
Consumer Measures and Consumer Engagement
30 October 2024



About the Utility Regulator

The Utility Regulator is the independent non-ministerial government department responsible for regulating Northern Ireland's electricity, gas, water and sewerage industries, to promote the short and long-term interests of consumers.

We are not a policy-making department of government, but we make sure that the energy and water utility industries in Northern Ireland are regulated and developed within ministerial policy as set out in our statutory duties.

We are governed by a Board of Directors and are accountable to the Northern Ireland Assembly through financial and annual reporting obligations.

We are based at Queens House in the centre of Belfast. The Chief Executive and two Executive Directors lead teams in each of the main functional areas in the organisation: CEO Office; Price Controls; Networks and Energy Futures; and Markets and Consumer Protection. The staff team includes economists, engineers, accountants, utility specialists, legal advisors and administration professionals.



Abstract

This annex provides detail on our final decisions in respect of Consumer Measures and Consumer Engagement for NIE Networks for the RP7 period. All consumer measures proposed in the draft determination have been retained in the final determination. This paper sets out the consumer measures with targets that will apply from Year 1 of RP7, and those consumer measures where targets will be set to apply from the start of Year 2 or 3 of RP7. The Consumer Engagement Advisory Panel (CEAP) will play a vital role with regard to the RP7 consumer measures framework which is explained in the annex.

Audience

NIE Networks, consumers, consumer representatives, consumer groups, other regulated companies in the energy industry, government, and other bodies with an interest in the energy industry.

Consumer impact

The package of consumer measures creates a framework that will help to embed high levels of service, identify key issues affecting the consumer experience and improve the quality of service consumers receive from NIE Networks throughout the price control period.

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Executive Summary

In keeping with the Utility Regulator's (UR) strategic objective of providing the highest level of consumer service and protection, this annex provides detail on our decisions in respect of Consumer Measures and Consumer Engagement for NIE Networks for the RP7 period. These decisions follow feedback from the consultation on the proposals in the draft determination.

Draft determination

In the draft determination we proposed 14 consumer measures as part of the RP7 Price Control¹. Some of these measures were put forward by NIE Networks in its business plan² and the remaining measures were proposed by UR. We also recognised the important role of the Consumer Engagement and Advisory Panel³ (CEAP) for RP7. The panel oversaw consumer engagement throughout RP6 and played a vital role ensuring that the consumer voice was heard. We proposed CEAP should continue to play an important role throughout RP7.

Subsequent to the draft determination publication, we have assessed and considered the relevant draft determination responses and representations made by NIE Networks and other stakeholders. We have considered these contributions to reach our final determination. We have also had ongoing engagement with NIE Networks and members of CEAP.

Final determination

For the final determination for RP7 we have retained all 14 consumer measures. The package of consumer measures creates a framework that will help to embed high levels of service, identify key issues affecting the consumer experience and improve the quality of service consumers receive from NIE Networks throughout the price control period. The framework will do this by:

- Requiring NIE Networks to support consumers in vulnerable circumstances and to demonstrate this by gaining and maintaining the BS ISO 22458 standard on Consumer Vulnerability⁴;
- Measuring the responsiveness of NIE Networks' contact centre performance;
- Measuring the effectiveness of NIE Networks' complaint resolution function;

¹ [Annex U - Consumer Measures and Engagement.pdf \(uregni.gov.uk\)](#)

² [rp7-business-plan-full-report-april-2023.aspx \(nienetworks.co.uk\)](#). Page 58 – 60.

³ The Consumer Engagement and Advisory Panel (CEAP) consists of representatives from the Consumer Council for Northern Ireland (CCNI), the Department for the Economy (DfE), NIE Networks and UR.

⁴ [BS ISO 22458 - Consumer vulnerability | BSI \(bsigroup.com\)](#).

- Providing insight into the consumer experience on electricity matters involving supply interruptions, connections, and the energy transition using established methods such as satisfaction surveys and the Net Promoter Score; and
- Measuring the responsiveness and timeliness of NIE Networks' connection services.

Below we discuss our approach to setting targets for the relevant consumer measures to be implemented at the start of Year 1, Year 2 or Year 3.

Consumer measures and setting targets

We have set targets for six consumer measures where we have robust historical data to use as a baseline against which we can reliably set the target and monitor and review NIE Networks' performance annually from the outset of RP7. We detail these in Table 1 below.

	Consumer Measure	Draft Determination Target	Final Determination Target
1	BS ISO 22458 on Consumer Vulnerability - the design and delivery of inclusive services.	Certification	Seek accreditation in Year 1, with attainment within 6 months of the start of Year 2 at the latest.
2	Enquiries: response within 2 days	90%	94%
3	Enquiries: response within 5 days	100%	98%
4	All Calls answered	99%	99%
5	% Calls answered within service level- 20 seconds	93%	93%
6	Customer Satisfaction Surveys	8.2	8.2

Table 1: Consumer measures and targets from Year 1

For the remaining measures we have not set out targets in the final determination, we have, however, set out the process through which targets will be set. There were limitations on the data available for these measures which reduced our ability to assess baseline performance and set out reliable targets to apply from the start of Year 1. We detail these in the Table 2 below.

	Consumer Measure	Draft Determination Target	Final Determination Target
7	Complaints to be resolved Day +1 (24hrs)	80%	Target set to apply from start of Year 2
8	Complaints to be resolved Day +31	95%	Target set to apply from start of Year 2
9	Net Promoter Score (NPS)	No target	Target set to apply from start of Year 2
10	First Point of Contact Resolution (FPOCR)	No target	Target set to apply from start of Year 2
11	Communication Channels	No target	Target (s) set to apply from start of Year 2
12	Time to Connect and Time to Quote	No target	Target set to apply from start of Year 3
13	Connections - Customer Satisfaction Surveys	No target	Target set to apply from start of Year 2
14	Energy Transition - Customer Satisfaction Surveys	No target	Target set to apply from start of Year 2

Table 2: Consumer measures and target position for Year 2 or 3

For these measures we require NIE Networks to collect the relevant data for each measure to establish a baseline and report this to UR and CEAP to enable the setting of targets that will apply from the start of Year 2. In the case of the Time to Quote (TTQ) and Time to Connect (TTC) measures, targets will apply from the start of Year 3. It is important to highlight that the data collection period is based on the calendar year (January – December). This enables 12 months of data to be collected and provides three months for UR and CEAP to review the data and set appropriate targets. This approach will ensure a target value is set to commence from 1 April of Year 2 or Year 3 for the relevant consumer measures.

Consumer engagement throughout RP7

CEAP will play a vital role with regard to the RP7 consumer measures framework. The panel will help to develop the consumer measures and the associated targets. Additionally, NIE Networks' performance against all the RP7 consumer measures and associated targets will be reviewed and assessed annually through CEAP. CEAP will also produce a publicly available report on NIE Networks' performance for the measures.

1. Introduction

- 1.1 This annex provides detail on our decisions in respect of Consumer Measures and Consumer Engagement for NIE Networks for the RP7 period.
- 1.2 NIE Networks identified three key themes in its business plan⁵ to meet customers' needs which are directly relevant to this annex. These three themes consisted of:
- Protecting vulnerable customers;
 - Digitalisation; and
 - Enabling our customers to become more active in their energy usage.
- 1.3 To deliver against these three themes, NIE Networks proposed in its business plan that the RP7 consumer measures would focus on the following areas:
- Supporting vulnerable customers;
 - Enhancing customer service;
 - Supporting customers with the energy transition;
 - Enhancing connections services; and
 - Supporting competition in connections.
- 1.4 NIE Networks only proposed formal measures and targets for the enhancing customer service aspect as part of its business case and proposed that the appropriate measures and targets for the other areas could be developed through CEAP. This was to reflect the role the panel played throughout RP6. We discuss the role of CEAP in more detail below.

⁵ [rp7-business-plan-full-report-april-2023.aspx \(nienetworks.co.uk\)](https://www.nienetworks.co.uk/rp7-business-plan-full-report-april-2023.aspx). Page 58 – 60.

2. Overview of Draft Determination

Consumer measures and engagement

- 2.1 In the draft determination we proposed 14 consumer measures as part of the RP7 Price Control⁶. Some measures were put forward by NIE Networks in its business plan and the remaining measures were proposed by UR. The consumer measures proposed were relevant to each of NIE Networks' areas of focus as described above (Paragraph 1.3).
- 2.2 Table 2.1 below outlines all the proposed consumer measures for RP7 and identifies those measures proposed by UR and those proposed by NIE Networks.
- 2.3 Although we did not propose targets for most of the new measures we put forward, we did propose that NIE Networks would collect the data and report on it through CEAP. The purpose was to establish a baseline for NIE Networks' performance to develop targets during RP7.
- 2.4 In the draft determination we also recognised the role of CEAP for RP7. The panel oversaw consumer engagement throughout RP6 and played a vital role ensuring that the consumer voice was heard throughout this price control. CEAP consists of representatives of the Consumer Council for Northern Ireland (CCNI), the Department for the Economy (DfE), NIE Networks and UR. Each panel member can provide invaluable consumer insight relevant to RP7 and the consumer measures framework.
- 2.5 We highlighted in the draft determination that a new Terms of Reference was being developed to incorporate RP7. This was to help ensure that the consumer voice was adequately taken account of by NIE Networks through CEAP and to embed the panel's role overseeing consumer engagement throughout RP7.

⁶ [Annex U - Consumer Measures and Engagement.pdf \(uregni.gov.uk\)](#)

Consumer Measure	Draft Determination Target	Source
Supporting Vulnerable Customers		
UR Proposed Measures for Data Collection and Reporting		
BS ISO 22458 on Consumer Vulnerability - the design and delivery of inclusive services.	Certification	UR Best Practice Framework
Enhancing Customer Service		
NIE Networks Proposed Measures and Targets for Customer Contacts		
Enquiries: response within 2 days	90%	NIE Networks
Enquiries: response within 5 days	100%	NIE Networks
Complaints to be resolved Day +1 (24hrs)	80%	RiIO-ED2
Complaints to be resolved Day +31	95%	RiIO-ED2
All Calls answered	99%	NIE Networks
% Calls answered within service level- 20 seconds	93%	NIE Networks
UR Proposed Measures for Data Collection and Reporting		
Net Promoter Score (NPS)	No target	UR – NI Water Precedent
First Point of Contact Resolution (FPOCR)	No target	UR – NI Water Precedent
Customer Satisfaction Surveys	8.2	RiIO-ED1
Communication Channels	No target	RiIO-ED2
Enhancing Connections Service and Supporting Competition in Connections		
UR Proposed Measures for Data Collection and Reporting		
Time to Connect and Time to Quote	No target	RiIO-ED2
Customer Satisfaction Surveys	No target	RiIO-ED2
Supporting Customers with Energy Transition		
UR Proposed Measures for Data Collection and Reporting		
Customer Satisfaction Surveys	No target	UR

Table 2.1: Summary of draft determination proposed consumer measures

3. Overview of Final Determination

Consumer measures and engagement

- 3.1 This chapter of the paper outlines high level stakeholder comments in response to our consultation relevant to the proposed consumer measures and approach to consumer engagement. It also details our final decision on retaining the consumer measures proposed in the draft determination. Full details of our responses to stakeholder feedback to our draft determination are found in Annex Z - Consultation Responses Report.

Consultation responses

- 3.2 We received comments from several stakeholders in response to our consultation relevant to the consumer measures and the consumer engagement approach proposed in the draft determination. This included specific comments from NIE Networks and CCNI related to measures and targets, and the role of CEAP. Other stakeholders provided more general comments that we consider relevant to the range of consumer measures. We highlight the high-level comments we consider most relevant to the consumer measures below to help provide context before discussing each consumer measure in more detail in Chapter 4.
- 3.3 CCNI broadly agreed with UR's proposed consumer measures detailed in the draft determination and with the approach in principle of developing the measures and targets through CEAP. However, CCNI recommended that targets should be in place from Year 1 for those measures without targets proposed in the draft determination. CCNI also commented that where setting a target was not possible for the start of RP7, a clear process and timeline should be set out in the final determination. CCNI also commented that all targets should be stretching and realistic.
- 3.4 NIE Networks commented that appropriate time was required to collect sufficient robust data on the new measures proposed in the draft determination in order to establish baseline performance.
- 3.5 SONI welcomed the proposed measures, especially those related to vulnerable customers and supporting customers through the energy transition. SONI also explained that it was important to apply a proportionate, fair, and balanced approach when considering the metrics and targets.
- 3.6 National Energy Action Northern Ireland (NEA) commented on the need for NIE Networks to work with UR to protect consumers and support vulnerable consumers. NEA also commented on the need for realistic but stretching targets and felt that there should be no rewards for business-as-usual activities.

Final determination on consumer measures

- 3.7 We have retained all 14 consumer measures proposed in the draft determination in the final determination.
- 3.8 We consider that the package of consumer measures creates a framework that will help to protect consumers and improve the quality of service they receive in the electricity market throughout the price control period. The framework will do this by:
- Requiring NIE Networks to support consumers in vulnerable circumstances in line with the internationally recognised ISO standard for Consumer Vulnerability;
 - Measuring the responsiveness of NIE Networks' contact centre performance including for telephone contacts and contacts through digital channels;
 - Measuring the effectiveness of NIE Networks' complaint resolution function;
 - Providing insight into the consumer experience across various points of interaction with NIE Networks, including on matters involving supply interruptions, connections, and the energy transition by using recognised performance measures such as satisfaction surveys, Net Promoter Scores and First Point of Contact Resolution metrics; and
 - Measuring the responsiveness and timeliness of NIE Networks' connection services.
- 3.9 We also consider that the measures are suitably aligned with NIE Networks' areas of focus that were detailed in its business plan.
- 3.10 As highlighted above we also note the broad support from those consumer advocacy bodies and industry respondents that provided feedback on the consumer measures detailed in the draft determination.
- 3.11 No financial incentive is attached to NIE Networks' performance on these measures.

Consumer engagement throughout RP7

- 3.12 As previously highlighted, CEAP will play a vital role throughout RP7. The panel will do this by reviewing and reporting on NIE Networks' performance each year for all consumers measures. Also, where it was not possible to set targets at the outset of RP7, CEAP will support the development of these

measures and associated targets. This will be facilitated by regular engagement through CEAP.

- 3.13 A new Terms of Reference for the group was agreed in January 2024 which underpins the above approach including producing an annual report on NIE Networks' performance against the consumer measures set out in the RP7 Price Control. The annual review and report are discussed in more detail in Chapter 6.

Setting targets for the consumer measures

- 3.14 Chapter 4 and 5 set out our final decision for each measure and the associated target. We also provide an overview of the draft determination position and highlight stakeholder key consultation response comments relevant to the measure.
- 3.15 For the purposes of these chapters, we have separated out the measures into two groups to aid the discussion on our final determination.
- 3.16 The first group is for those **consumer measures with targets set to apply from Year 1 of RP7**. This deals with five measures where we have set targets based on comparable historical NIE Networks data. It also includes the draft determination target score of 8.2 for the customer satisfaction survey. All targets will come into effect from the start of Year 1.
- 3.17 The second group is for **consumer measures with targets set to apply from the start of Year 2 or 3**. This group deals with those measures where targets are yet to be set as more work is required to develop and finalise the measure definitions, the approach to data collection, and establish associated targets. CEAP will play a significant role in this process.

4. Consumer Measures - Targets set to apply from Year 1

- 4.1 We have set targets for six consumer measures that will apply from the outset of RP7 in Year 1. Table 4.1 below provides an overview for each measure showing the draft determination and the final determination target position.
- 4.2 Performance against these measures and associated targets will be monitored and reviewed annually through CEAP. Where appropriate, targets may be reset to maintain the high standards for the enquiries and call metrics, and to ensure satisfaction levels are guided by the principle of continuous improvement throughout RP7. A final decision on any revised targets will be made by UR.

Consumer Measure	Draft Determination Target	Final Determination Target - Year 1
BS ISO 22458 on Consumer Vulnerability	Certification	Seek accreditation in Year 1, with attainment within 6 months of the start of Year 2 at the latest.
Enquiries: response within 2 days	90%	94%
Enquiries: response within 5 days	100%	98%
All Calls answered	99%	99%
% Calls answered within service level- 20 seconds	93%	93%
Customer Satisfaction Surveys	8.2	8.2

Table 4.1: Final determination consumer measures and targets

- 4.3 Below we outline the draft determination position for each consumer measure, highlight stakeholder key comments, detail our response and set out our final decision for that measure and the associated target.

Measure: BS ISO 22458 on Consumer Vulnerability

- 4.4 We proposed in the draft determination that NIE Networks gains the international accreditation BS ISO 22458 standard on Consumer Vulnerability for RP7. This is in line with our recommendation detailed in our Code of Practice for Consumers in Vulnerable Circumstances⁷.

⁷ [BPF Decision - Code of Practice for Consumers in Vulnerable Circumstances March 2024.pdf \(uregni.gov.uk\)](#)

- 4.5 CCNI specifically welcomed this proposed measure. SONI also welcomed measures related to vulnerable customers. Additionally, NEA underlined the importance of NIE Networks and UR supporting vulnerable consumers through the Consumer Protection Programme.
- 4.6 CCNI commented that without a specific target in place on when NIE Networks should obtain certification there could be a delay in efforts to achieve this ISO standard.
- 4.7 We welcome stakeholder support for the consumer vulnerability measure and recognise the CCNI's point on the importance of a target for NIE Networks to achieve the ISO standard.
- 4.8 We expect consumers in vulnerable circumstances to be protected by the companies we regulate including NIE Networks. Our new Code of Practice for Consumers in Vulnerable Circumstances ensures a regulatory consumer protection mechanism will apply from the start of RP7.
- 4.9 However, gaining the BS ISO 22458 Consumer Vulnerability accreditation is also consistent with our new Code of Practice for Consumers in Vulnerable Circumstances⁸ which specifically recommends that all companies obtain this standard. Achieving the ISO accreditation will demonstrate NIE Networks' commitment to protecting consumers in vulnerable circumstances and we consider it important that this is achieved early in RP7.
- 4.10 One respondent to the draft determination suggested the introduction of a target to increase awareness of the customer care registers. The new Code of Practice for Consumers in Vulnerable Circumstances contains requirements⁹ related to the awareness of customer care registers along with a wider range of measures to protect those in vulnerable circumstances. We consider that this CoP deals with the importance of increasing awareness of the customer care registers without the need to set a target as part of RP7. We also note that UR will be tracking awareness in this area through our annual domestic consumer insight survey¹⁰.
- 4.11 One respondent also suggested the introduction of a satisfaction measure specific to the customer care register. The new Code of Practice for Consumers in Vulnerable Circumstances contains a requirement¹¹ for companies to conduct research and engagement with consumers in vulnerable circumstances including those on customer care registers. We consider it reasonable that a satisfaction survey could be part of this required

⁸ Principle 1 Measure 2 (1.2).

⁹ Principle 2 Measure 4 (2.4); Principle 3 Measure 3 (3.3); Principle 3 Measure 4 (3.4); Principle 3 Measure 6 (3.6); Principle 4 Measure 3 (4.3); and Principle 9 Measure 2 (9.2).

¹⁰ [Microsoft Word - NIAUR Domestic Tracker draft report - final version \(uregni.gov.uk\)](#)

¹¹ Principle 10 Measure 1 (10.1).

research undertaken by companies without the need to incorporate this into RP7.

Final Determination

- 4.12 Taking account of stakeholder feedback and support for the measure, we have retained the BS ISO 22458 on Consumer Vulnerability - the design and delivery of inclusive services – for RP7.
- 4.13 We also require NIE Networks to seek accreditation in Year 1, with attainment within 6 months of the start of Year 2 at the latest.

Measures: Responding to enquiries within 2 days and 5 days; All calls answered; and % of calls answered within service level - 20 seconds

- 4.14 In the draft determination we explained that NIE Networks proposed to maintain its existing standards for enquiries and calls based on its established performance, so we proposed the same target values put forward by NIE Networks.
- 4.15 There were limited comments from those stakeholders that provided views on these consumer measures. However, CCNI and NEA did express the general need for targets to be stretching and realistic which we consider relevant to these measures.
- 4.16 We agree that targets must be stretching and realistic. Table 4.2 below shows NIE Networks' performance over the last 6 years highlighting if they achieved, exceeded or missed the target proposed in the draft determination.
- 4.17 We observe that:
- NIE Networks exceeded the proposed draft determination target in each of the last 6 years for responding to 90% of customer enquiries within 2 days.
 - NIE Networks has not achieved the proposed draft determination target in any of the last 6 years for responding to 100% of enquiries within 5 days.
 - NIE Networks achieved the target in 5 out of 6 years for answering all calls, with the average performance over the last 6 years at 99.32%.
 - NIE Networks has not achieved the draft determination target over the last 4 years for answering 93% of calls within 20 seconds but that they did meet the target in 2018/19 and 2019/20.

Draft Determination		NIE Networks Historical Performance by Financial Year					
Consumer Measure	Target	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24
Enquiries: response within 2 days	90%	93%	95%	95%	93%	94%	95%
Enquiries: response within 5 days	100%	97%	98%	98%	96%	96%	97%
All Calls answered	99%	99.57%	99.52%	99.39%	99.40%	99.21%	98.80%
% Calls answered within service level- 20 seconds	93%	93%	93%	91%	92%	90%	89%
Green	NIE Networks exceeded the proposed draft determination target						
Red	NIE Networks did not achieve the proposed draft determination target						

Table 4.2: Enquiries and call performance over last 6 years

Final Determination

4.18 We have retained all the enquiry and call handling measures proposed in the draft determination. To ensure targets are stretching and realistic we consider it appropriate to:

- **Increase the target for the Enquiries: response within 2 days** measure from 90% to 94%. This is based on NIE Networks' average performance over the last 6 years.
- **Reduce the target for the Enquiries: response within 5 days** measure from 100% to 98%. This is based on NIE Networks' performance for 2019/20 and 2020/21.
- **Retain the draft determination position for NIE Networks to answer 99% of all customer telephone calls** to maintain its high levels of performance in this area.
- **Retain the draft determination position for NIE Networks to answer 93% of all customer telephone calls within 20 seconds.** This is based on NIE Networks' performance for 2018/19 and 2019/20.

4.19 We consider that the associated targets for the above measures are stretching and realistic, and that these will help to maintain a high level of performance from Year 1 of RP7.

Measure: Customer Satisfaction Surveys

4.20 In the draft determination we explained that NIE Networks did not propose any targets for the customer satisfaction survey scores as part of its

business plan as they were moving to an external provider to carry out future satisfaction surveys.

- 4.21 We noted that Ofgem continued with its customer satisfaction survey measure for DNOs as part of RIIO-ED2 and that external parties carry out DNO's satisfaction surveys.
- 4.22 In the draft determination we proposed an overall customer satisfaction target score of 8.2 which consists of supply interruptions, connections, and general enquiries satisfaction surveys. We also stated the target would be discussed and reviewed throughout the price control period.
- 4.23 CCNI commented that the target value of 8.2 proposed in the draft determination is less stretching than the target set by Ofgem for RIIO-ED2 which was 9.01. They recommended that the target is set at 9.01 so aligned to RIIO-ED2.
- 4.24 NIE Networks felt that the target of 8.2 from RIIO-ED1 was an appropriate comparator for RP7 as this was the target prior to financial incentives being introduced by Ofgem for GB DNOs.
- 4.25 CCNI also commented that they felt there was a case to introduce a financial incentive for the customer satisfaction survey noting Ofgem's RIIO-ED2 approach. On the theme of financial incentives, NEA made a more general point that there should be no rewards for business-as-usual activities but did not specifically identify the satisfaction survey. Taking account of stakeholder feedback, we consider that it is appropriate that this measure remains reputational in nature where NIE Networks' performance can be compared with GB DNOs and is not a financial incentive.

Final Determination

- 4.26 We have retained the measure on customer satisfaction surveys. We consider that the draft determination target score of 8.2 remains appropriate for Year 1. This helps to set out our minimum expectations in this area as a starting point for RP7.
- 4.27 We do recognise the need for continuous improvement to customer satisfaction scores throughout the price control period. We, along with CEAP, will assess and challenge customer satisfaction performance annually throughout the price control period. Where appropriate, as part of this annual process, the target may be reset guided by the principle of continuous improvement.

5. Consumer Measures - Targets set to apply from Year 2 or 3

5.1 In this chapter we discuss those measures where targets have not been set out in the final determination. Table 5.1 below identifies these measures and highlights those that we require targets to apply from the start of Year 2 or Year 3 which is 1 April of the relevant year.

Consumer Measure	Draft Determination Target	Final Determination Target Position
Complaints to be resolved Day +1 (24hrs)	80%	Set target for start of Year 2 (April)
Complaints to be resolved Day +31	100%	Set target for start of Year 2 (April)
Net Promoter Score (NPS)	No Target Set	Set target for start of Year 2 (April)
First Point of Contact Resolution (FPOCR)	No Target Set	Set target for start of Year 2 (April)
Communication Channels	No Target Set	Set target for start of Year 2 (April)
Energy Transition - Customer Satisfaction Surveys	No Target Set	Set target for start of Year 2 (April)
Connections - Customer Satisfaction Surveys	No Target Set	Set target for start of Year 2 (April)
Time to Connect and Time to Quote	No Target Set	Set target for start of Year 3 (April)

Table 5.1: Final determination consumer measures and target position

- 5.2 While we are retaining all measures as part of the final determination, there were limitations on the data available for the measures stated above which reduced our ability to set out a reliable target to apply from the start of Year 1. The limitations included limited or no historical data available to set reliable targets, lack of clarity on definitions and a material change on the approach to data collection.
- 5.3 This means alongside the targets, the definitions for the measures and approach to data collection need further development and agreement to establish reliable target values. CEAP will be key to this process.
- 5.4 However, we do consider it appropriate to set targets for most of these measures to apply from the start of Year 2 on 1 April 2026. The only measure that will take longer to set targets is the TTQ and TTC measure and we discuss this below.

- 5.5 Below we detail the required approach to setting targets to apply from the start of Year 2 along with key milestones and associated timelines:
- **Develop and finalise measure definitions by January 2025:** This will ensure that there is a shared, clear and precise understanding of the measures and provide for the collection of accurate and consistent customer service performance data. This must be completed by January 2025.
 - **Develop and finalise the data collection methodology by January 2025:** This will take place alongside finalising the definitions. This will help to ensure the data is collected in a way that is reliable and consistent and allows insight into NIE Networks' performance. This must be completed by January 2025.
 - **Data collection throughout the calendar year for 2025 (January 2025 – December 2025):** We require NIE Networks to collect the relevant data for January 2025 and each month throughout the calendar year (January to December). This enables 12 months of data to be collected to inform the target setting process. The annual data set will also have a monthly profile to provide greater insight into the consumer experience.
 - **Establish and set a target for Year 2 by end of February 2026:** NIE Networks will report to UR on the data throughout the calendar year. They will also report and engage through CEAP throughout the calendar year. When 12 months of data is collected, UR and CEAP will review the data and undertake analysis to discuss performance and to set targets early in 2026 and no later than by the end of February 2026. This means targets will come into effect from the start of Year 2 on 1 April 2026.
- 5.6 As indicated above CEAP will play a significant role in developing these measures including establishing suitable targets. It is important to note the final decision on the target value will be made by UR.
- 5.7 As highlighted above the only measures that will take longer to set targets for are the TTQ and TTC measures. NIE Networks explained they need sufficient time to collect relevant data which means this data will be collected from the start of and throughout Year 2. Targets will be set to apply from Year 3 (1 April) using the above approach.
- 5.8 Below we outline the draft determination position for each consumer measure, highlight stakeholder key comments, detail our response and set out the final decision for that measure in line with the above approach.

Measures: Complaints to be resolved Day +1 (24hrs) and Complaints to be resolved Day +31

- 5.9 In our draft determination we proposed that 80% of complaints should be resolved within 1 day and 95% should be resolved within 31 days. NIE Networks proposed to introduce these measures as part of its RP7 business plan. This allows NIE Networks' performance to be compared to GB DNOs. The targets are the same as Ofgem's complaint metrics for RIIO-ED2¹².
- 5.10 There were no specific comments about these measures, but we do consider the more general stakeholder feedback relevant. This includes the consumer bodies' view that targets need to be stretching and realistic. It also includes the industry perspective that appropriate time was required to collect sufficient data, and it was important to apply a proportionate, fair, and balanced approach when considering the metrics and targets.
- 5.11 NIE Networks currently collects data for the percentage of complaints they respond to within 2 days and 5 days. It does not collect data that is directly comparable to the measures proposed in the draft determination on the percentage of complaints resolved within the specified timeframes. This means we were unable to establish reliable targets based on NIE Networks' historic performance to apply from the outset of Year 1. In this context no targets have been set out in the final determination, but we require the relevant data to be collected and reported on to UR and CEAP.
- 5.12 We expect consumers to receive a timely resolution of their complaint and that complaints are handled in line with best practice. The measures will provide valuable insight into the consumer experience. In the absence of a target detailed in the final determination it is important to explain that we will be considering NIE Networks' performance against GB DNOs from the outset of RP7.

Final Determination

- 5.13 We have retained the measures, and we require NIE Networks to collect and report on comparable data so that targets can be set to apply from the start of Year 2.
- 5.14 It is important to note that NIE Networks' performance will still be assessed in Year 1 and reported on by CEAP.

¹² [RIIO-ED2 Final Determinations Core Methodology Document \(ofgem.gov.uk\)](https://www.ofgem.gov.uk/riio-ed2-final-determinations-core-methodology-document). Section 5: Meeting the needs of consumers and network users. Complaints Metric, page 108 – 111.

Measure: Net Promoter Score

- 5.15 In our draft determination we proposed that NIE Networks formally report on its Net Promoter Score (NPS) performance and that this is discussed through CEAP. This was to take account of NIE Networks' move to an independent external provider for collecting data on this measure which will help provide more confidence on its performance.
- 5.16 In response to the draft determination, CCNI supported the measure and suggested ways to set a target.

Final Determination

- 5.17 After considering feedback for this measure and the change in the data collection methodology, we consider our draft determination position remains appropriate so have retained this measure and require a target to be set to apply from the start of Year 2. The approach is aligned with our overarching approach for the other measures where limitations exist with the available data.

Measure: First Point of Contact Resolution (FPOCR)

- 5.18 NIE Networks monitors its performance and collects data for the First Point of Contact Resolution measure. In our draft determination we proposed that NIE Networks reports on the data collected through CEAP to discuss the setting of targets.
- 5.19 In response to the draft determination, CCNI supported the measure and suggested that the target could be aligned with the NI Water target.

Final Determination

- 5.20 We welcome the support for the measure, but we have not set a target as part of the final determination and consider the draft determination position to develop the target through CEAP appropriate. However, we require that a target is set to apply from the start of Year 2.

Measure(s): Communication Channels

- 5.21 In our draft determination we explained that NIE Networks proposed improving communication channels including through a multi-channel communication function at its contact centre, self-serve platform, and its website. NIE Networks did not propose any specific measures and targets.

- 5.22 We proposed that NIE Networks collect and report on the same data¹³ detailed in RIIO-ED2 to explore the possible development of new measures and targets through CEAP.
- 5.23 There was limited feedback on this measure. However, CCNI agreed with our proposed approach to the communication channels measure.

Final Determination

- 5.24 We consider that our draft determination position remains appropriate. We have retained the measure and require NIE Networks to collect and report on the same data detailed in RIIO-ED2¹⁴.
- 5.25 However, more work is required on finalising definitions, the approach to data collection and establishing appropriate targets. This will be progressed through CEAP. We require targets to be set to apply from the start of Year 2 of the price control period.

Measure: Energy Transition - Customer Satisfaction Surveys

- 5.26 We explained in the draft determination that NIE Networks proposed that they will become a 'trusted expert' in helping customers to transition to a low carbon future.
- 5.27 We proposed a customer satisfaction measure in this area and explained that targets could be developed through CEAP.
- 5.28 CCNI supported our proposed approach set out in the draft determination but suggested that the final determination sets out a timeline for CEAP agreed targets to commence.

Final Determination

- 5.29 We consider that the measure remains appropriate and have retained this as part of RP7. We require targets to be set to apply from the start of Year 2 of the price control period. We recognise this measure may evolve over time and anticipate that CEAP will play a role in developing the measure.

¹³ [RIIO-ED2 Final Determinations Core Methodology Document \(ofgem.gov.uk\)](#) Section 5: Meeting the needs of consumers and network users. Communication channel metrics, page 111-112. Number of inbound communications that are received by the DNO's public contact channels, recorded by channel type; number of visits to DNO's website; number of unique visitors to DNO's website; maximum concurrent visitors to DNO's website; average and maximum load time for the DNO's website; percentage of website load times that exceed 5 seconds.

¹⁴ [RIIO-ED2 Final Determinations Core Methodology Document \(ofgem.gov.uk\)](#). Footnote 13.

Measures: Time to Quote and Time to Connect; and Connections - Customer Satisfaction Surveys

- 5.30 In the draft determination we noted that NIE Networks proposed in its business plan to maintain its performance on TTQ and Time TTC metrics.
- 5.31 We also noted that RIIO-ED2 set out targets¹⁵ for both these areas, so we proposed that NIE Networks continue to collect data and report on this to help establish a benchmark for NIE Networks' performance to support comparison with DNO performance in GB.
- 5.32 We proposed that CEAP should assess the appropriateness of TTQ and TTC metrics for Northern Ireland and whether targets will be set over the course of RP7. We noted in the draft determination that the customer satisfaction survey will also provide insight into the consumer experience in this area.
- 5.33 CCNI felt that targets should be set for TTQ and TTC so that NIE Networks performance is comparable to GB DNOs in line with Ofgem's metrics.
- 5.34 NIE Networks has explained to UR that they require sufficient time to develop appropriate TTQ and TTC data collection methodologies to establish performance more comparable to GB DNOs.
- 5.35 CCNI commented on the importance of the final determination confirming a date for commencement of CEAP agreed targets.

Final Determination

- 5.36 We consider the TTQ, TTC and satisfaction measures remain appropriate and have retained these.
- 5.37 Taking account of CCNI and NIE Networks' feedback for the TTQ and TTC we require targets to be set to apply from Year 3. CEAP will help develop these measures including the definitions, approach to data collection and target setting in a way that is appropriate for Northern Ireland customers.
- 5.38 For the satisfaction survey measure we require targets to be set to apply from the start of Year 2.

¹⁵ [RIIO-ED2 Final Determinations Core Methodology Document \(ofgem.gov.uk\)](https://www.ofgem.gov.uk/riio-ed2-final-determinations-core-methodology-document). Section 5: Meeting the needs of consumers and network users. Time to Connect Incentive (minor connection customers).

6. Consumer Engagement

CEAP

- 6.1 CEAP will play a pivotal role in developing, monitoring and reviewing the consumer measures. As previously highlighted, CEAP is made up of designated representatives from CCNI, DfE, NIE Networks and UR. A key purpose of the panel is to review and report on performance against price control customer commitments.

CEAP annual review

- 6.2 In this context CEAP will carry out an annual review and analysis of NIE Networks' performance against all measures. Where appropriate through analysing NIE Networks' baseline data and using appropriate comparators in the market, make proposals on resetting targets. However, the final decision on the target value will be taken by UR.
- 6.3 The annual review will start in early quarter 4 of the financial year during the month of January or early February. The review will be completed in advance of the new financial year to enable any new target to come into effect from 1 April. This annual process is repeated throughout RP7.

UR review

- 6.4 UR will also be reviewing performance against all the consumer measures and considering how NIE Networks compares to GB DNO performance, the Institute of Customer Service's (ICS) metrics on the Utility Sector customer service performance and NIE Networks' historical performance. Over time, and at the end of each year, we will also analyse NIE Networks' data to establish and assess any outlier performance issues that affect the targets.

CEAP annual report

- 6.5 CEAP will also report on NIE Networks' performance for each measure and will capture the key findings of the panel's analysis through a published short annual report. This report will discuss the issues identified and capture how best NIE Networks proposes to deal with these issues. NIE Networks will be assessed on its performance for the previous year, and they will outline how they intend to improve for the year ahead.
- 6.6 As above we anticipate that the review and reporting activity will start early in quarter 4 of the financial year (during January or early February) and will be completed in advance of the new financial year. This means UR can ensure any resetting of targets apply from the start of the next financial year. We also note that CEAP meetings will take place at least quarterly which

provides the opportunity for the panel to consider performance at regular intervals throughout the year.

Publication of the CEAP report

- 6.7 The report will be published and made available on the NIE Networks website. Publication of the report will help to ensure transparency and accountability of NIE Networks' performance.
- 6.8 The above approach is aligned with the CEAP terms of reference which explains the panel will produce an annual report which includes reporting on performance against the relevant consumer measure requirements set out in RP7.