6 Quality of service

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Introduction

6.1. For a given level of quality of service in the supply of electricity to consumers, there will be a relevant level of both capital and operating (R&M) expenditure incurred in achieving that level and maintaining it over time, although there will not necessarily be a linear relationship. Thus quality standards imposed by legislation or set by the DG, together with any others which NIE itself wishes or feels obliged to meet, will have implications for both capital and operating expenditure.

6.2. Performance characteristics which relate to the quality of service provided by NIE to its customers fall under two broad headings: customer care and quality of supply. Customer care is concerned with the delivery of specific services, especially with the time taken by NIE to respond to or take action in a variety of circumstances such as responding to billing enquiries, the replacement of a main fuse after a failure and giving adequate notice of planned outages. It also covers the handling of complaints and appointments. Most of these services are the responsibility of the Supply Business, but some are the responsibility of T&D. Time-based criteria concerning customer care performance form the basis of most of the Guaranteed and Overall Standards described in detail later in this chapter. They are set by the DG after consultation with NIE and others.

6.3. The performance characteristics under the quality of supply heading are concerned with the physical performance of the system and are principally the concern of the T&D Business. They include the frequency and duration of interruptions in supply to customers and variations in voltage and electrical frequency. These aspects are of especial interest to industrial consumers but, with the increasing proliferation and sophistication of electrically-operated equipment in the home, they are also of increasing importance to the domestic consumer.

6.4. All the PESs in the UK are required by law to provide information annually to the relevant regulator on their performance against a number of quality of supply criteria. Most of the PESs, including NIE, subscribe to the NAFIRS[1] scheme under which quality of supply performance data supplied by these companies are collated and circulated to the members of the scheme thus enabling them to make performance comparisons. Important criteria reported under this scheme include availability, security and reliability. The first is measured in terms of average minutes lost per connected customer in a year, usually referred to as

[1]NAFIRS-National Fault Interruption and Reporting Scheme, a data collection and collating scheme covering a range of fault statistics provided by subscribing companies and administered by Electricity Association Services Ltd. There is no obligation to join the scheme: NIE is a recent subscriber whereas Eastern has withdrawn. The NAFIRS report is not published and is not available to non-members or the DG.

customer minutes lost (CML), the second in terms of supply interruptions per 100 connected customers a year (IPC), and the third in terms of faults per 100 km of mains distribution system a year. As yet none of these performance criteria have been included within either the Guaranteed or Overall Standards of Performance, whether in Great Britain or Northern Ireland (but see paragraph 6.10). In formulating his proposals for NIE's price controls the DG did not stipulate required levels for quality of supply criteria relating to the capital and operating expenditure he was prepared to sanction. Thus, at present, it is left to NIE to set its own quality of supply performance targets. In doing so it has taken account of comparisons with selected Great Britain PESs which it considers bear some similarity with its own geographical and topographical situation (Manweb, SWALEC, SWEB and SHE), although it told us that none of the Great Britain PESs faces conditions which precisely matched those in Northern Ireland. We consider the subject of comparisons in more detail later in this chapter.

Guaranteed and Overall Standards

6.5. Article 42 of the Electricity Order provides for the making of regulations prescribing standards of performance for the provision of electricity supply services to tariff customers in Northern Ireland. Flowing from this, the Electricity Standards of Performance Regulations (NI) 1993[1] (the Regulations) define Guaranteed Standards which set service levels which must be met in each individual case. Whenever the licensee fails to meet the specified level of service it must make a payment, of an amount prescribed by the Regulations, to the customers affected. The Regulations require that such standards can be set by the DG only after he has consulted NIE and other affected persons and has carried out research to discover the views of affected parties.

6.6. The Guaranteed Standards of Performance currently in place for NIE are shown in Table 6.1. The service areas and penalty payments are identical to the standards introduced in Great Britain in 1991 except that GS7 was voluntarily introduced by NIE in place of the Great Britain GS7 standard `Responding to Meter Problems' pending the introduction of new meter regulations for Northern Ireland. These standards are mainly concerned with customer care although GS1 and GS2 will affect availability and therefore relate to quality of supply.

[1]Electricity Standards and Performance Regulations (NI) 1993. Statutory Regulation No 448 1993.

TABLE 6.1 **NIE: Guaranteed Standards of Performance applicable since 1 January 1994**

GS	*Service*	*Performance level*	*Penalty payment*
1.	Replacement of NIE main fuse after failure	Within 4 hours	£20
2.	Restoring supply after distribution faults	Within 24 hours of supplier becoming aware of fault	£40 domestic customers, £100 non-domestic customers. Plus £20 for each additional 12 hours
3.	Providing supply and a meter	Within 3 working days (domestic customers) or 5 working days (non-domestic customers)	£20 Plus £40 (domestic) or £100 (non-domestic) for failure to keep appointment
4.	Providing estimate of connection charges	Within 10 working days for connections to existing lines and 20 working days for others	£40
5.	Giving notice of planned supply interruption	2 days	£20 domestic customers £40 non-domestic customers
6.	Investigation of voltage complaints	Within 10 working days	£20 plus £20 for failure to keep appointment
7.	Investigation of meter accuracy disputes*	Within 10 working days	£20 plus £20 for failure to keep appointment
8.	Responding to queries on charges or payments	Within 10 working days	£20
9.	Offering and keeping of appointments	Between 8.30 am and 1.00 pm or 12.00 noon and 5.00 pm, Mon-Fri	£20
10.	Making of payments owed under the standards	Within 10 working days	£20

Source: OFREG Report on Customer Service Standards 1995/96.

*This standard has been voluntarily introduced by NIE.

6.7. Table 6.2 gives the numbers of payments made by NIE in 1994/95 and 1995/96 in respect of failures to meet Guaranteed Standards. It shows that the level of payments in 1995/96 was much higher than in 1994/95, very largely because of an increase in the number of failures to give two days' notice of planned supply interruptions (GS5) and, to a lesser extent, an increase in the number of failures to restore supply within 24 hours after distribution faults (GS2). The DG remarked in a consultation paper of November 1996 on his current review of performance standards[1] that there had been a marked drop in the number of defaults against Guaranteed Standards since September 1995 although it would take another six months before this was fully reflected in the annual figures.

[1]*Northern Ireland Electricity plc: Standards of Performance Review*. A consultation paper, November 1996. Issued and distributed by OFREG.

TABLE 6.2 **Number of Guaranteed Standard payments made by NIE**

GS	*Service*	*1994/95*	*1995/96*
1.	Main fuse replacement	0	0
2.	Restoration of supply after distribution faults	15	98
3.	Provision of new supply	15	17
4.	Estimate for new supply	24	8
5.	Notice of planned supply interruption	405	665
6.	Voltage complaints	3	0
7.	Meter accuracy (voluntary standard)	0	0
8.	Billing and payment queries	43	48
9.	Appointments	59	40
10.	Payments due under the standards	42	68
Total		606	944

Source: OFREG Report on Customer Service Standards 1995/96.

6.8. The Electricity Order also provides that the DG may, after consultation and research, determine Overall Standards of Performance for the provision of electricity supply services with which NIE must comply. NIE is not obliged to make compensation payments to affected customers in the event of failure to meet these standards but is required by law[1] to conduct its business in such a way as can reasonably be expected to lead to their achievement as adjudged by the DG. The service areas specified are the same as in Great Britain except for an additional standard, OS9, relating to the recalibration of prepayment meters. The meter reading standard has been set at a higher level than in Great Britain (98 per cent). Again, with the exception of OS1 and OS2 these standards deal mainly with aspects of customer care.

6.9. The Overall Standards of Performance currently in place for NIE are shown in Table 6.3.

TABLE 6.3 **NIE: Overall Standards of Performance applicable since 1 January 1994**

OS	*Service*	*Performance level*
1.	Restoration of supply following system faults	*(a)* 85% in 3 hours *(b)* 99% in 24 hours
2.	Correction of voltage problems	85% in 6 months
3.	Provision of new low voltage supplies	*(a)* 90% in 30 working days (domestic) *(b)* 90% in 40 working days (non-domestic)
4.	Reconnection of customers disconnected for non-payment	100% the working day after arrears are paid
5.	Relocation of ordinary meters	90% in 15 working days
6.	Change of meter due to change of tariff	90% within 10 working days
7.	Meter reading	99% at least once a year
8.	Responding to customer letters	95% in 10 working days
9.	Recalibration of prepayment meters	85% within 10 weeks of the due date

Source: OFREG Report on Customer Service Standards 1995/96.

6.10. Shortly before the end of our inquiry the DG sent to NIE his proposals for new Standards of Performance for NIE (see Appendix 6.1). There was insufficient time for NIE to analyse and provide detailed comments to us on these proposals before the completion date of our report. However, NIE told us that it regarded the revision to GS2 (Restoration of supply after distribution faults) as onerous and difficult to achieve. It pointed out that the current GS2 standard covered only the restoration of supply within a given period, whereas the new proposal contained quality of supply requirements in respect of meeting specified

[1]Article 7 of the Competition and Service (Electricity) (Northern Ireland) Order 1992.

limits for off-supply duration and frequency, including a penalty for two or more off-supply occurrences in any 12-month period (see Appendix 6.1). NIE said that the proposed new GS2 standard implied increased physical infrastructure and capital spend. It added that it did not accept an extended period of non-compliance and resulting frequent penalty payments as an option. We note that the DG's proposals envisage a new standard (OS10) on system performance which would set a target for CML.

6.11. NIE told us that it had a number of internal codes of practice for the design of its distribution network which influenced its performance. In the particular case of the 11 kV rural network the objective of the relevant code of practice was to achieve a rate of not more than eight faults a year for any customer. In its network performance targets NIE aimed, subject to a cost-benefit analysis test being passed, to design its 11 kV and 6.6 kV networks such that the maximum number of interruptions a year experienced by any connected customer would be in the range of four to eight.

6.12. NIE said that it was also obliged under its licence to produce a code of practice on the efficient use of electricity and to provide an energy efficiency advice service. Unlike the PESs in Great Britain, NIE did not have any standards of performance for energy efficiency at the time of our inquiry.

Customer care bench-marking

6.13. In his 1995/96 Report on Customer Service Standards the DG stated that NIE had fewer customers than any of the Great Britain PESs but that, relative to their number, the customers were spread over a wider geographical area than for any other PES. He compared the number of payments made by NIE for failing to meet Guaranteed Standards with the number of payments made by three comparator PESs, SWALEC, SWEB and SHE, which he considered possessed characteristics near to those of NIE. These comparisons are shown in Table 6.4.

TABLE 6.4 **Comparison of payments made for defaults against Guaranteed Standards (number per 100,000 tariff customers)**

GS	*NIE*	*SWALEC*	*SWEB*	*SHE*	*Average for comparator PESs*	*Average for all Great Britain PESs*
1	0.00	0.00	0.08	0.00	0.03	0.19
2	15.11	3.98	1.39	0.80	2.06	1.63
3	2.62	0.00	0.00	0.16	0.05	0.09
4	1.23	0.31	0.23	0.32	0.29	0.09
5	102.54	19.90	7.26	3.03	10.06	3.42
6	0.00	0.10	0.39	0.00	0.16	0.11
7	0.00	0.21	0.00	0.64	0.28	0.37
8	7.40	1.99	2.55	1.59	2.04	1.91
9	6.17	11.62	7.11	23.73	14.15	11.44
10	9.87	0.00	0.54	1.43	0.66	1.79

Source: OFREG Report on Customer Service Standards 1995/96.

Note: The table compares NIE's performance for 1995/96 with Great Britain PESs' for 1994/95.

6.14. The level of payments made by NIE was significantly higher for GS2, GS3, GS4, GS5, GS8 and GS10 than the level of payments made by the comparator companies with, as already noted, a particularly poor performance in respect of GS5 (giving two days' notice of a planned supply interruption). NIE's performance was significantly better than the average of all Great Britain PESs on GS9 (appointments).

6.15. Overall Standards 1 to 8 are replicated in Great Britain, although the target percentage differs from company to company. For example, OS2 for NIE currently specifies that 85 per cent of voltage problems should be corrected within six months whereas the same standard for Great Britain PESs ranges from 80 per cent (SWALEC) to 100 per cent (Midlands). Table 6.5, which gives a direct comparison between the companies irrespective of the dissimilar achievement targets set by the relevant regulator, shows that NIE's performance against Overall Standards is marginally below that of the average of Great Britain PESs, with the exception of OS7 (meter reading) where its performance is slightly better.

TABLE 6.5 **Comparison of performance against Overall Standards**

GS	*NIE*	*SWALEC*	*SWEB*	*SHE*	*Average for comparator Great Britain PESs*	*Average for all Great Britain PESs*
1*(a)*	86.4	89.6	89.5	82.4	87.2	88.4
1*(b)*	99.9	99.9	100.0	99.9	99.9	99.9
2	97.1	100.0	99.2	99.2	99.5	99.3
3*(a)*	98.6	100.0	99.9	100.0	99.9	99.9
3*(b)*	99.4	N/A	N/A	N/A	N/A	N/A
4	98.9	100.0	100.0	100.0	100.0	100.0
5	96.1	100.0	99.8	99.2	99.7	99.4
6	98.4	99.5	99.8	100.0	99.8	98.5
7	99.0	97.3	98.2	98.4	98.0	98.6
8	96.0	100.0	99.9	99.7	99.9	99.9

Source: OFREG Report on Customer Service Standards 1995/96.

Note: OS9 does not apply in Great Britain.

6.16. The DG in his consultation paper of November 1996 solicited views on the standards relating to customer services, questioning whether they should be tightened up or expanded, but he did not make any specific proposals of his own at that time. He stated that he was planning to set new standards to take effect from 1 April 1998. Meanwhile the existing standards remain and, in the absence of any specific proposals, estimates of the amount of capital and operating expenditure needed to meet and to continue to meet Guaranteed and Overall Standards over the next regulatory period can only be based on the existing standards as set out in Tables 6.1 and 6.2. If the Guaranteed or Overall Standards were to be tightened, or new standards added, as a result of the consultation exercise, as the DG has now proposed (see paragraph 6.10), some increase in capital or operating expenditure might be required to meet the new levels.

Quality of supply bench-marking

6.17. As noted, the Guaranteed and Overall Standards of Performance mostly concern customer care rather than quality of supply, although certain criteria under the latter heading are covered, for example replacement of main fuse (GS1), restoring supply after distribution faults (GS2/OS1) and correction of voltage problems (OS2). Whilst there are no mandatory standards covering other aspects of quality of supply, the DG requires NIE to provide certain information on the performance of its T&D network to be reported to him annually under Condition 19 Part II of NIE's licence. NIE complies with this obligation by providing the DG with the specific data he requires (similar to those collated within the NAFIRS scheme) and it is the intention of the DG to publish a document similar to the OFFER report on distribution and transmission system performance giving comparative results of the Great Britain PESs and NIE. Initial comparative bar charts for 1994/95 provided by OFREG are shown in Figures 6.1 and 6.2.

6.18. Relevant measures of quality of supply collated within NAFIRS and reported to the DG include:

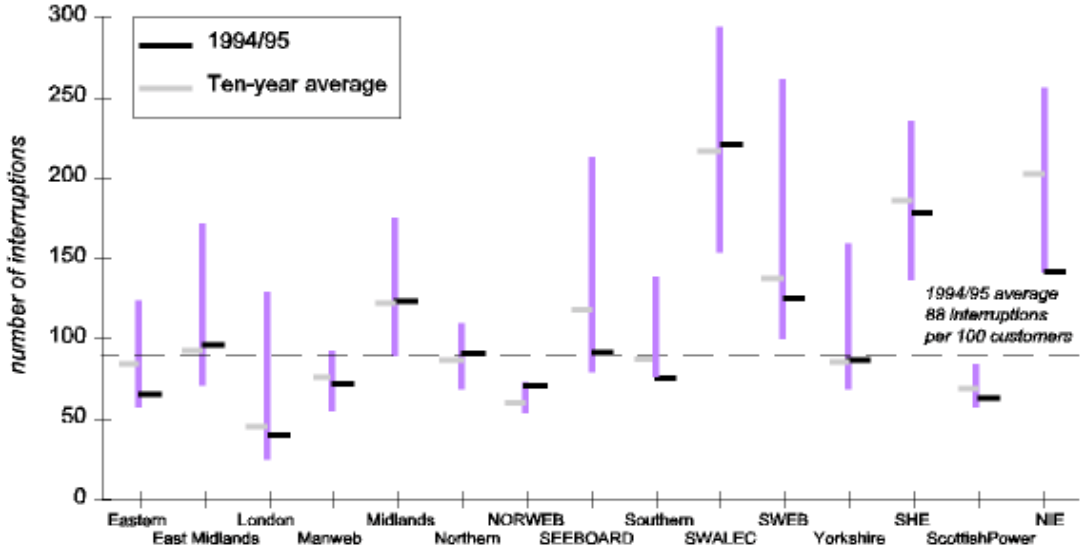
Availability	-	Minutes lost per connected customer (CML).
Security	-	Supply interruptions per 100 connected customers (IPC).
Voltage	-	Verified voltage complaints per 10,000 connected customers.
Overall reliability	-	Number of faults per 100 km of distribution system (mains only).

While there are no standards for these aspects of performance currently laid down by the DG, the results of the monitoring are used as comparators by both NIE and the DG and form the basis of discussions on quality of supply performance between them.

6.19. In its response to the DG's investment planning questionnaire, submitted in October 1995, NIE said it recognized that the level of performance of the NIE network compared unfavourably with the equivalent levels achieved by the Great Britain PESs and that accordingly it had set target levels for performance improvement. These targets were quoted as an improvement of 33 per cent in security (IPC), 49 per cent in availability (CML) and 8 per cent in overall reliability, compared with performance in 1994/95, by the year 2002/03.

FIGURE 6.1

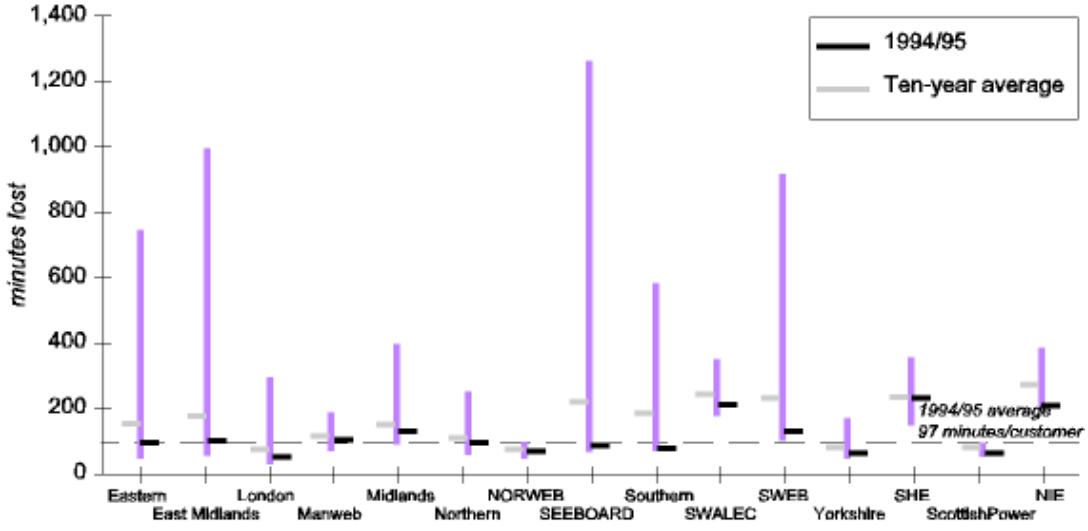
Security—supply interruptions per 100 connected customers



Source: OFREG.

Note: Vertical line indicates range over ten years.

Availability—minutes lost per connected customer

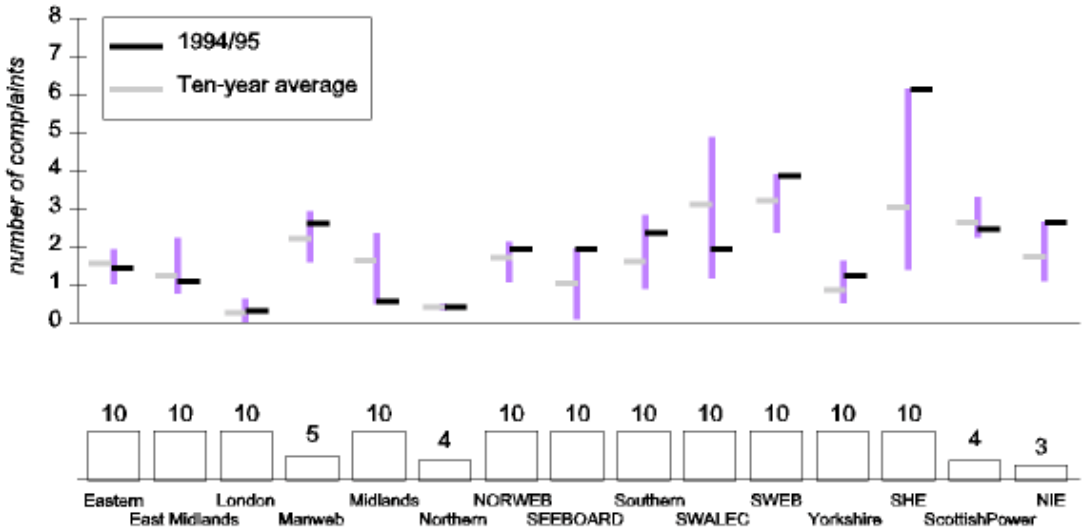


Source: OFREG.

Note: Vertical line indicates range over ten years.

FIGURE 6.2

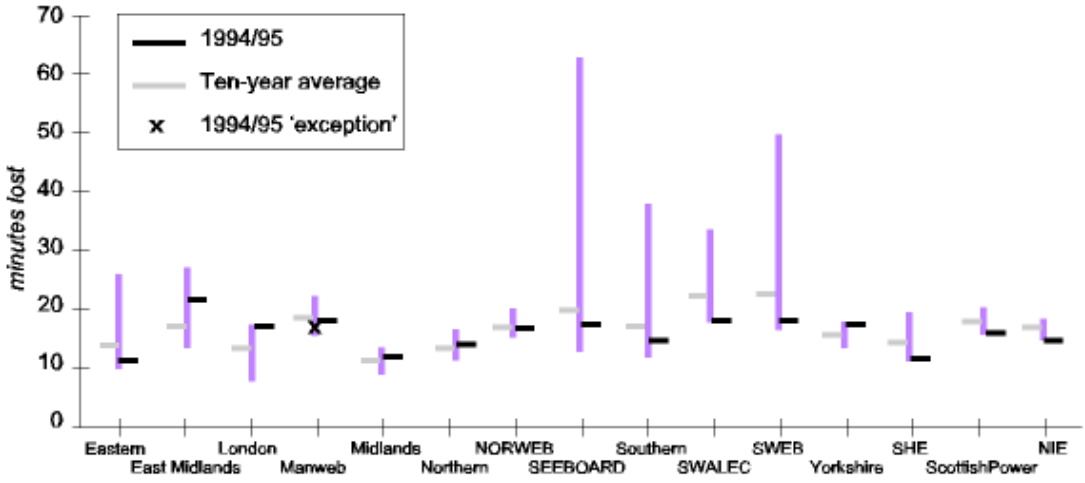
Voltage—verified voltage complaints per 10,000 connected customers



Source: OFREG.

Note: Vertical line indicates range since recording started.

Overall reliability—number of faults per 100 km of distribution system (mains only)



Source: OFREG.

Note: Vertical line indicates range over ten years.

6.20. We turn next to possible comparative measures of quality of supply. In its evidence to us, NIE said that it aimed to improve its current overall CML performance in line with its estimates of the projected improvement of the comparator PESs (that is, SWALEC, SWEB and SHE). It estimated that this would mean achieving an average CML of 107 for the distribution network by the year 2002/03, (117 by 2001/02, the end of the forthcoming regulatory period). A further three minutes would be added to CML because of transmission faults. NIE provided a chart (Figure 6.3) showing how its proposed CML target compared with its projections for the comparator PESs.

6.21. The data set out in Figure 6.4 show NIE's performance on CML for the three years 1993/94 to 1995/96 broken down between urban and rural areas. These data illustrate clearly the low CML for the urban areas, where the distribution lines are largely underground and the population relatively dense, compared with the wholly rural districts with overhead distribution lines and a sparse population where the CML are an order of magnitude higher. Data published by OFFER in its annual reports on distribution and transmission system performance show that this pattern is present also in Great Britain PESs. Figure 6.4 illustrates that the large improvement envisaged by NIE depends primarily on reducing CML in the rural districts. This would involve significant capital expenditure, principally on refurbishment or replacement of the 11 kV network (some 300 circuits connected to 55,000 pole-mounted transformers) together with an appropriate level of R&M work.

6.22. NIE told us that it had developed a model to assess the performance benefits which would be likely to flow from the following specific categories of work:

(a) overhead line refurbishment;

(b) application of modern protection policy;

(c) additional switchgear/automation; and

(d) system development.

NIE said that indicative measures of availability improvement (reduced CML) were related to the length of 11 kV line refurbished each year (see Table 6.6).

TABLE 6.6 **Projected availability improvement as a result of various levels of refurbishment**

Kms of 11 kV line refurbished	1,000	1,200	1,400	1,600	1,800
Reduction in CML per year during the five-year regulatory period	28	34	39	45	50

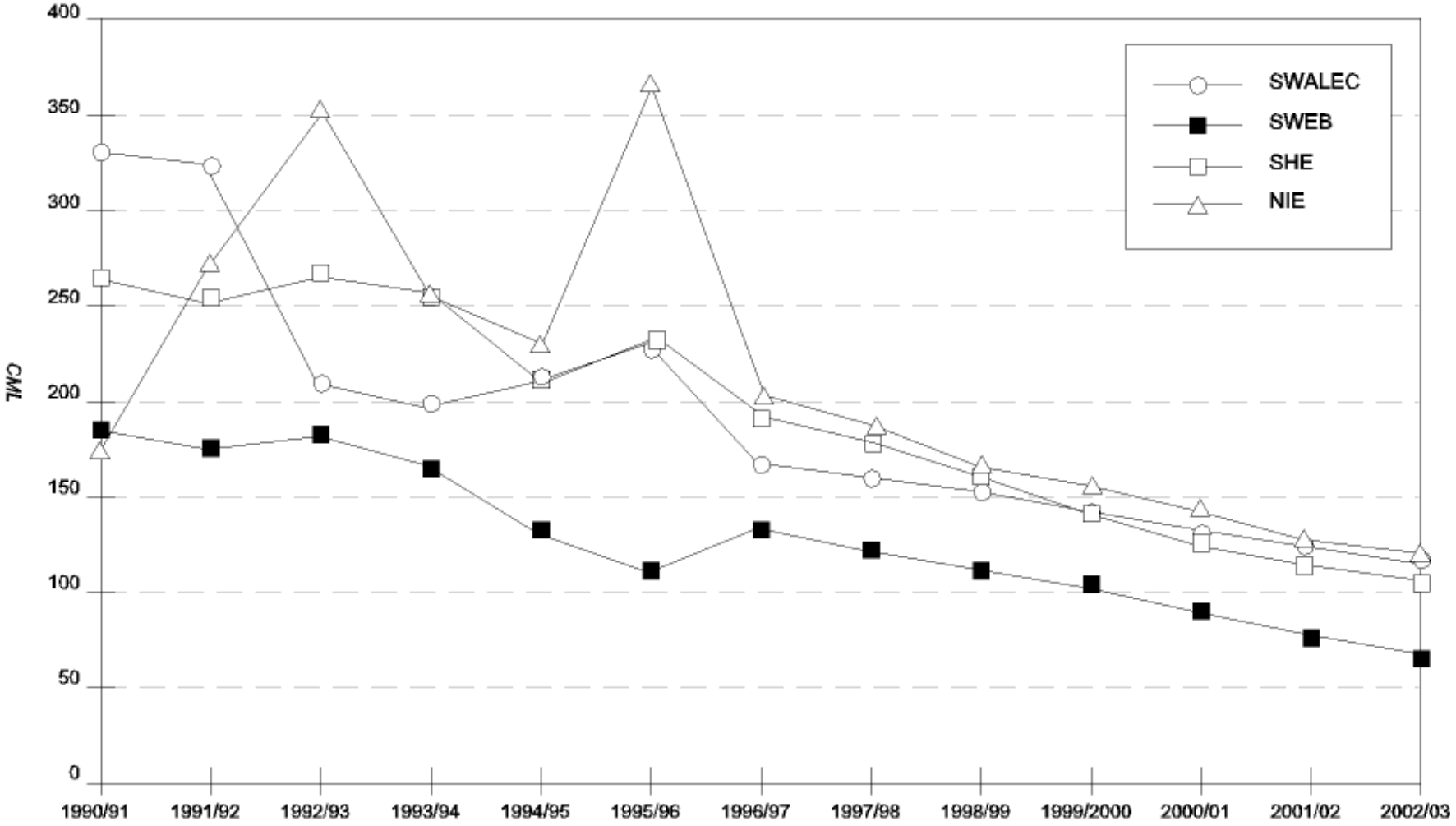
Source: NIE.

6.23. To allow a full assessment of the level of availability likely to be reached by 2001/02 account must also be taken of the additional contribution to performance improvement that will flow from SCADA (Supervisory Control and Data Acquisition) and improved techniques for handling prearranged outages (for example, use of diesel generators and live-line working). NIE estimated that during 1996 the latter techniques had delivered savings of around 28 CML, and now thought that a further annual reduction of 10 CML could be achieved by these means. In addition NIE estimated that the introduction of SCADA could save 11 CML a year.

6.24. NIE told us that the rate of CML for 1996/97 up to the end of December 1996 was 198 while the target set for the full year to March 1997 was 190. Taking that target level as the availability index for the start of the next regulatory period, and allowing for SCADA and improved handling of prearranged outages, Table 6.7 shows how availability is likely to improve with different yearly levels of line refurbishment. NIE told us that these projections assumed average weather and that the maintenance programme would counteract deterioration in lines not being refurbished and therefore would neither improve nor reduce performance.

FIGURE 6.3

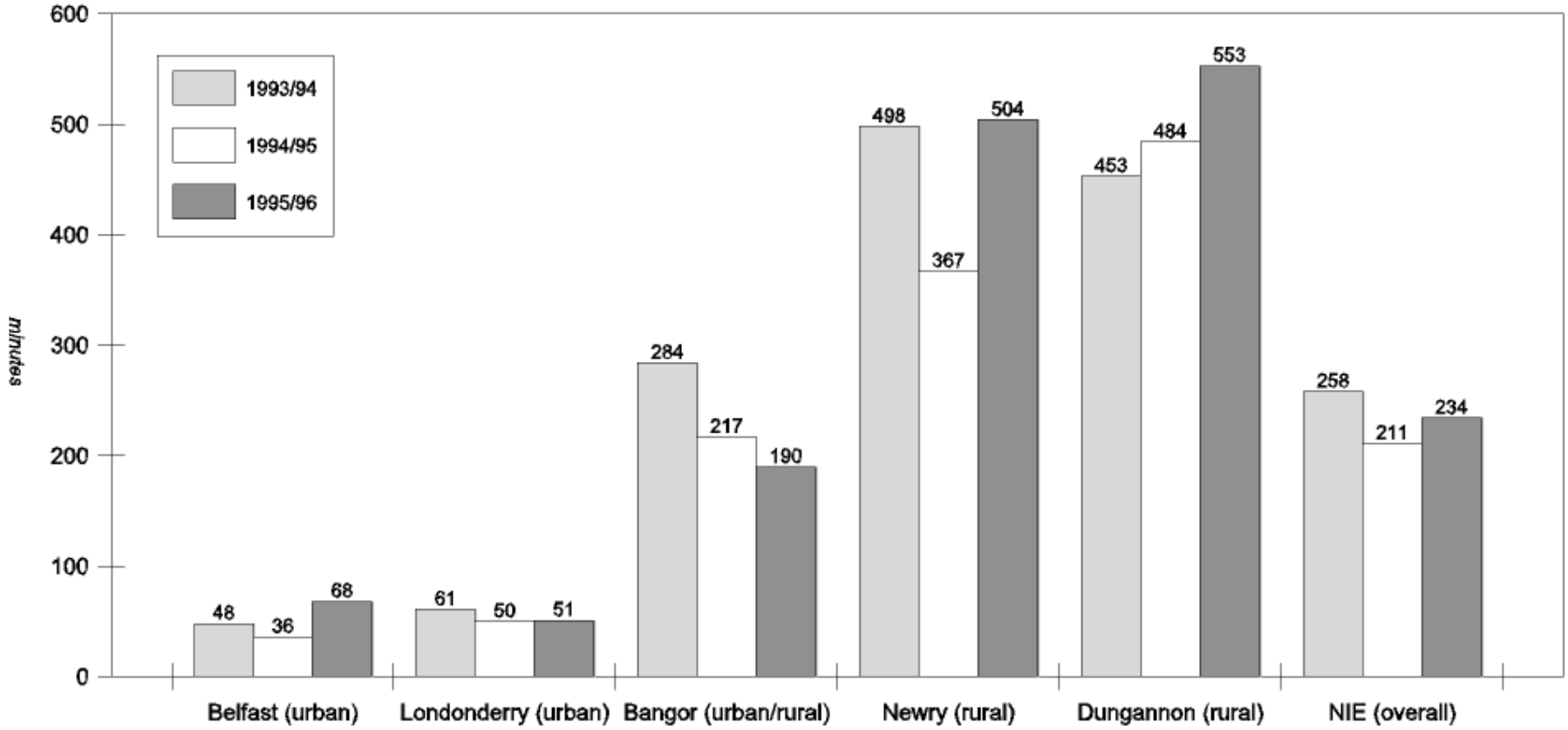
NIE's availability (CML) projections for sample comparators



Source: NIE.

FIGURE 6.4

NIE minutes lost per connected customer (urban v rural)



Source: NIE.

Note: Approximate customer numbers: urban = 215,000; rural = 210,000; urban/rural = 240,000.

TABLE 6.7 **Projected availability improvement as a result of various levels of refurbishment plus other measures***

Kms of line refurbished	1,000	1,200	1,400	1,600	1,800
Reduction in CML per year during the five-year regulatory period	49	55	60	66	71
Annual CML at end of regulatory period	141	135	130	124	119

Source: NIE.

*Application of modern protection policy, improved handling of prearranged outages and introduction of SCADA.

6.25. The DG told us that he did not believe it would be reasonable to expect the NIE T&D system, or that of certain other Great Britain companies, ever to reach the UK average levels for all indicators. There was no case for the NIE system to improve its levels of service relative to Great Britain PESs above those currently achieved, although the DG did accept that the performance of other systems in the UK was likely to improve over time. He expected NIE to maintain its present position relative to the performance of similar UK distribution systems and recognized that this would entail performance-related expenditure.

6.26. Figure 6.5 shows NIE's estimates of the effect of different levels of capital and operating expenditure on the level of CML which could be achieved. NIE estimated that with the amounts of capital and operating expenditure envisaged in the DG's price control proposals the resulting level of CML in 2001/02 would be 177 compared with its own target of 117 by that year. With NIE's planned level of operating expenditure but with the DG's figures for capital expenditure, NIE estimated that CML would be 150 by 2001/02. OFREG considered that this figure should be 120. NIE added that with the reduced capital expenditure it would need to spend more on R&M to cover parts of the network that would otherwise have been replaced.

6.27. We have considered CML at some length but the other measures listed in paragraph 6.18 could also be used for bench-marking. Faults per 100 km reflects the engineering performance of NIE. However, it has shortcomings as a measure of quality of service: for instance, compared with most Great Britain PESs, an equivalent level of faults within NIE would give a very different level of service because of its high ratio of line length to customer. The other measures listed in paragraph 6.18 reflect more directly the quality of service perceived by customers. IPC is a customer-orientated version of faults per 100 km. Minimizing voltage variations (including transient peak voltage disturbances) is of particular interest to industrial consumers and others who depend on sophisticated electrical and electronic equipment.

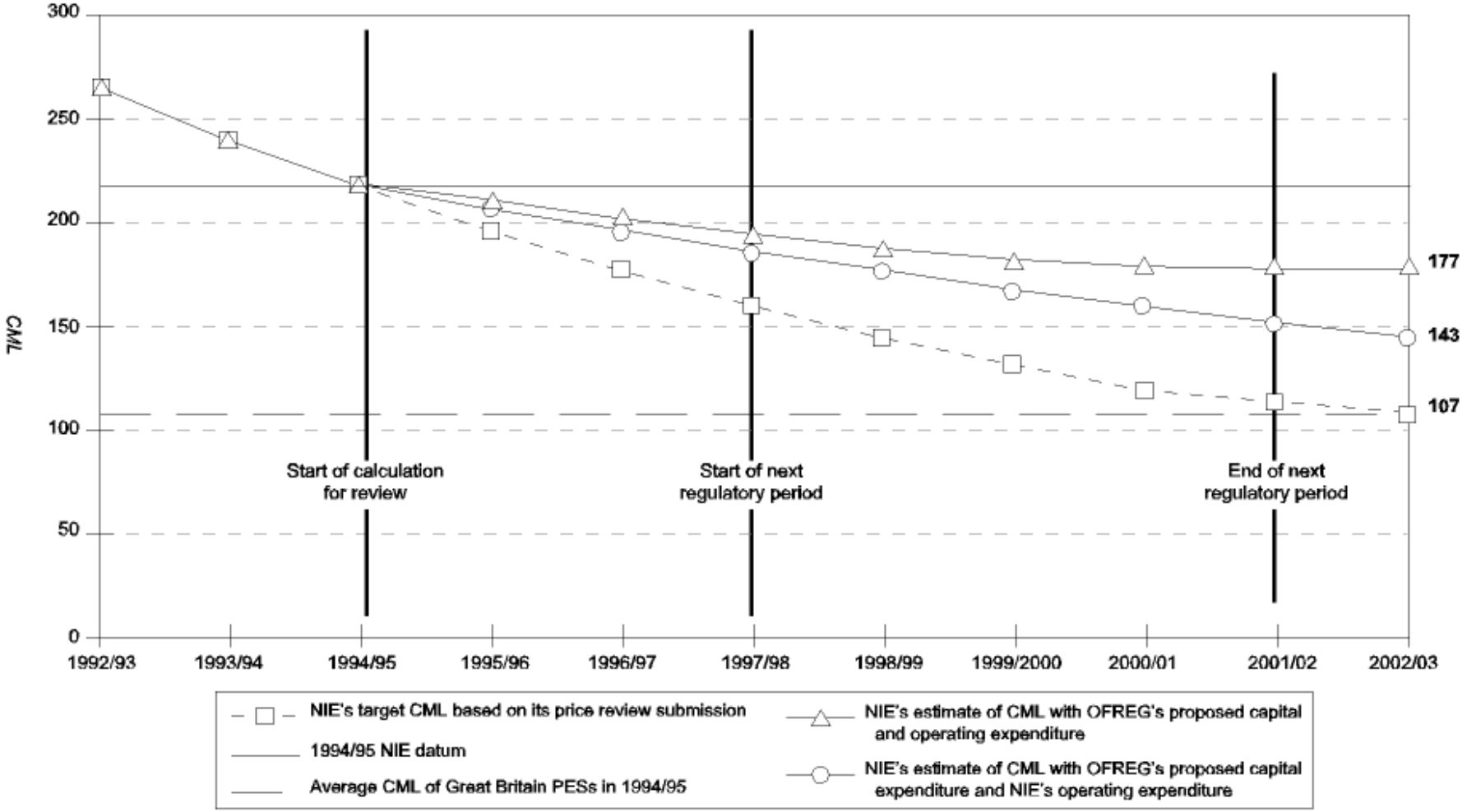
Quality of supply standards

6.28. If it were decided to introduce new quality of supply standards (and the DG has now proposed CML as an Overall Standard), decisions on the precise formulation of the standards would depend on a judgment as to where the balance lay between cost and quality of service. CML and IPC could conceivably be adopted as either Guaranteed or Overall Standards or both. Setting a Guaranteed Standard would require identification of both the level at which penalties start and the penalty scales. Setting an Overall Standard would only require the setting of an average level but could be more detailed (for example, no more than X per cent of customers to experience losses of more than Y minutes).

6.29. In its response to the DG’s consultation paper on his review of standards of performance submitted in December 1996, NIE indicated that, in its view, a Guaranteed Standard covering frequency of interruptions and CML should not be introduced at that time. It stated that the introduction of such Guaranteed Standards would require the collection of data at the level of individual consumers and pointed out that, since the NAFIRS database did not require this level of detail, it would involve considerable extra cost to provide systems and procedures to gather and process the information. NIE added that with its extensive network investment programme, which necessitated planned outages, alternative supply arrangements were often not possible. It believed that the introduction of a standard of performance on these aspects at the present time would impede its efforts to improve supply quality to customers in the longer term.

FIGURE 6.5

NIE's estimates of the effect on CML of different levels of expenditure



Source: NIE.

6.30. NIE informed us that it intended to move towards a new design standard and to deliver a minimum level of performance to all customers, with enhanced performance as an option. NIE gave examples of such enhanced performance as the installation and maintenance of a standby generator, or specific strengthening of the network (above the normal level) to individual customers. Any additional costs would be recovered through the connection charge. Whilst it considered it inappropriate (and impractical) to introduce additional standards covering network performance at this stage, it agreed that it was appropriate to provide additional information to consumers to reassure them that performance improvement expenditure allowed for in setting new price controls was being spent effectively. NIE intended to enhance its existing regular report on system performance, to produce a new report on quality of supply and to set targets for improvements in performance for the year ending March 2003, that is the first year of the subsequent regulatory period. The report on quality of supply would provide network performance data for each of the five geographical regions which broadly reflected the company's district structure (Belfast, Bangor, Ballymena, Craigavon and Campsie). Information would be provided on frequency and duration of interruptions, both in total and for different voltage levels, together with information about supply restoration times and verified voltage complaints. The report would also identify those parts of the network which suffered the most significant interruptions in terms of duration and frequency of interruption.

Customer surveys and complaints

6.31. Market research into domestic and commercial consumers' views on the quality of supply, carried out by OFREG for the Northern Ireland Consumer Committee for Electricity in 1993, showed that over 90 per cent of the research sample were not prepared to pay more for an improved quality of supply. This was supported by the results of a further market research survey on standards of performance carried out by OFREG in the autumn of 1996, and published in January 1997, as part of its review of performance standards. The results showed that over 90 per cent of the survey respondents, which again included both domestic and commercial consumers, were satisfied with the electricity supply service, and that over 90 per cent would not be prepared to pay more for an improved service. The results are given in Appendix 6.2.

6.32. NIE told us that of the 811 complaints relating to reliability and quality of supply which it had registered between April 1995 and November 1996, 83 per cent were from domestic consumers. There had also been some serious complaints from large industrial customers concerning quality of supply as well as tariff levels. NIE commented that over the same period it had received only 50 specific complaints about prices.

6.33. The OFREG Report on Customer Service Standards 1995/96, which gives the complaint levels for the year to 31 March 1996, noted that NIE had the lowest level of referred complaints of all 15 UK PESs at that time. In terms of complaints per 100,000 tariff customers for the year ending 30 September 1995 NIE had the lowest number of all PESs at 12, and in the year to 31 March 1996 the level was 18.9 which was still much lower than the comparators-SWALEC, SWEB and SHE-and indeed lower than the average for all Great Britain PESs at 29, as shown in Table 6.8. However, in his published intercompany comparisons for Northern Ireland and Great Britain for the quarter ending 30 September 1996, the DG observed that, whereas a year earlier NIE had the lowest number of such referred complaints in relation to customer numbers of any PES, it now had the third highest, the number of complaints having almost trebled.

TABLE 6.8 **Complaints per 100,000 tariff customers, year to March 1996**

Electricity company	*Complaints*
NIE	18.9
SWALEC	42.0
SWEB	42.0
SHE	29.0
Average-sample Great Britain PESs	38.0
Average-all Great Britain PESs	29.0

Source: OFREG Report on Customer Service Standards 1995/96.

6.34. By the year ending 30 September 1996 the rate of referred complaints about NIE had risen to 31 per 100,000 tariff customers. The DG attributed the sudden rise in complaints to an increased awareness of OFREG by consumers following a publicity campaign, not necessarily to a fall in performance standards by NIE, although he added that he expected NIE to reduce the number of complaints by improving its performance. NIE pointed to its significant improvements against the current Standards of Performance as evidence of its delivery of improved levels of customer service.