

RETAIL MARKET MONITORING
Annual Transparency Report
For calendar year 2017

Published 31st August 2018



Abstract

This paper is the latest of a series of Utility Regulator (UR) reports (the Quarterly Transparency Reports (QTRs) and Annual Transparency Report (ATRs), which provide a range of information about the retail energy market in Northern Ireland (NI).

The data relates mainly to market shares, market activity and domestic prices in the electricity and gas retail markets. The data also includes information on non-domestic, or industrial and commercial (I&C), electricity prices.

We collect and monitor market information through the Retail Energy Market Monitoring (REMM) framework.

The information shown in this report comes from network companies, suppliers and Eurostat. Some figures have been calculated internally.

The QTR reports are released at the end of the second month after each calendar quarter (in Feb, May, Aug and Nov).

The ATR report is the summation of the four quarters of the relevant calendar year.

Audience

Electricity and gas industry, associations of consumers, regulators, statistical bodies, suppliers, potential new market entrants, consultants, researchers and journalists.

Consumer impact

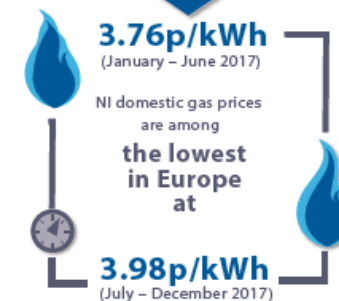
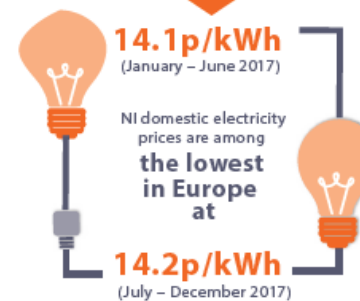
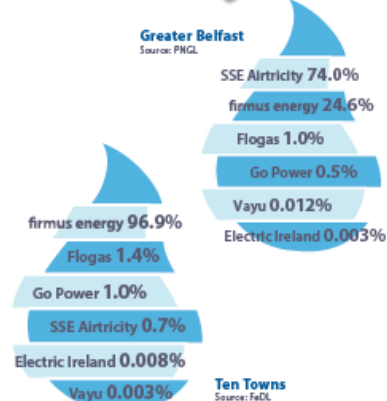
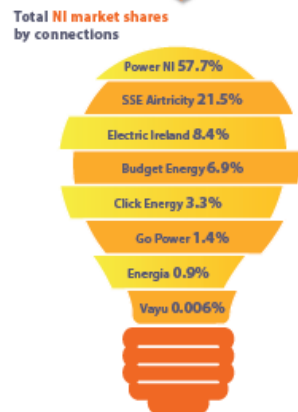
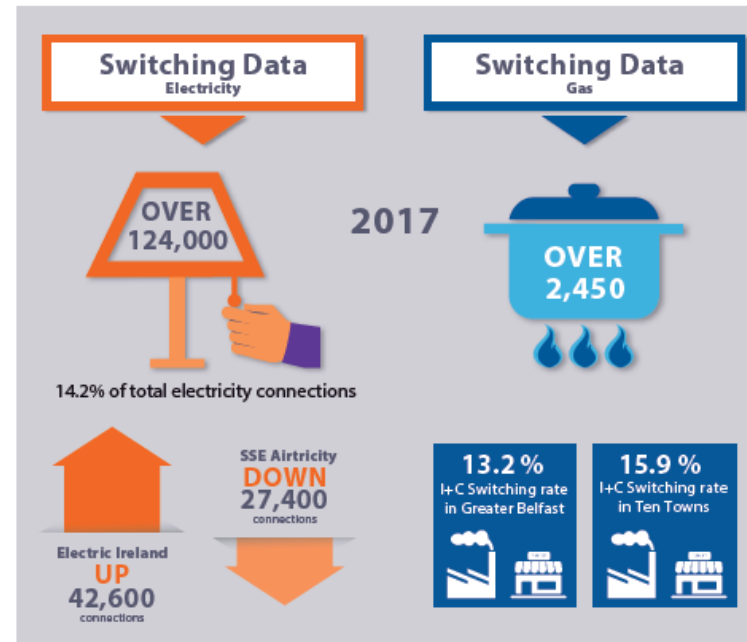
The information used to produce these reports allows us to monitor the retail market, flag potential concerns and to inform regulatory decisions. All of this directly impacts on consumers. This set of reports increases transparency for consumers on matters of their direct interest, such as the active suppliers in each energy market sector, and NI prices compared against other jurisdictions.

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1 Summary of key market indicators

Northern Ireland Retail Market Monitoring Annual Transparency Report 2017



1.1 Key developments during 2017

<p>1. As per the QTRs the electricity pricing data is sourced from Eurostat and individual supplier's submissions. The 2017 data outlined the following trends in prices:</p> <ul style="list-style-type: none"> • NI domestic electricity prices dropped during 2017. At the end of 2017 NI remain among the lowest in Europe at 14.2 p/kWh and considerably lower than the Republic of Ireland (21.0 p/kWh), the EU median (17.8 p/kWh) and the UK (16.5 p/kWh). • NI I&C electricity prices for the Very Small connections (which represent 67% of I&C connections) were one of the lowest in Europe. The NI price at 13.0 p/kWh was lower than the UK (14.3 p/kWh), the EU median (15.2 p/kWh) and Republic of Ireland (17.7 p/kWh). • For large I&C customers, prices are now equal to those in Rol and are lower than in the UK overall.
<p>2. In the gas markets the regulated tariffs for SSE Airtricity and firmus energy (the incumbent price controlled gas suppliers) increased during 2017. The tariff reviews indicated the following:</p> <ul style="list-style-type: none"> • 8.5% increase to the SSE Airtricity regulated tariff in the Greater Belfast area, taking effect from 1st April 2017. • 12.2% increase to the firmus energy regulated tariff in the Ten Towns area, taking effect from 1st April 2017.
<p>3. Market activity in the electricity domestic and I&C sectors continues to illustrate a change in the market dynamics. Based on total connections Power NI (the incumbent price controlled electricity supplier) retain their dominant position with 58.7% of the domestic market. Electric Ireland and Click Energy made considerable domestic gains during 2017 with a market share of 70,023 (8.4%) and 28,497 (3.3%) connections respectively as at the end of the year.</p>
<p>4. Domestic customers continue to actively engage in the electricity market with over 118,000 switches completed during 2017, indicating 14.8% of the market participating. There were over 5,600 I&C electricity switches during 2017. Both domestic and I&C switching was marginally down when compared to 2016.</p>
<p>5. In the gas sector, there was an increase in switching activity in the Greater Belfast area in 2017 with over 2,080 switches compared to 1,440 in 2016. I&C switching in the Ten Towns decreased during the year with 402 in 2017 compared to 679 in 2016.</p>

2 Introduction

2.1 Purpose, methodology and data sources

The purpose of this report is to deliver transparency for stakeholders and consumers, providing readers with readily accessible information on the evolution and performance of Northern Ireland (NI) electricity and natural gas retail sectors.

The Quarterly Transparency Reports (QTR) and Annual Transparency Reports (ATRs) serve as the primary platform we use to communicate some of the main indicators we monitor in the retail energy markets. We protect consumers by promoting effective competition wherever appropriate, and by monitoring the markets. Therefore, monitoring the retail markets is key when complying with our statutory duties.

The framework in which this annual report lies is the Retail Energy Market Monitoring (REMM) which was introduced in July 2015. The ultimate objective of introducing this enhanced framework was to develop the current monitoring of retail indicators, and to provide increased transparency in the retail energy markets in NI. As a result of this new framework, there have been a number of changes made to the format of this publication and how some of the indicators are presented.

The main data sources for this ATR are as follows:

- Connections and consumption, market shares and market activity information is provided by the network companies:
 - Northern Ireland Electricity Networks (NIEN) for electricity data; and
 - Phoenix Natural Gas Limited (PNGL) and firmus energy (Distribution) Limited (feDL).

- EU domestic and I&C electricity prices are from Eurostat. NI domestic and I&C electricity prices are derived directly from data submitted by suppliers.
- EU domestic gas prices are from Eurostat. Domestic gas prices for Great Britain (GB) and the Republic of Ireland (ROI) are derived from tariffs published by relevant suppliers. NI domestic gas prices are derived from the tariffs published by NI suppliers.

The ATR merges the relevant quarterly information for the calendar year from the Quarterly Transparency Reports (QTRs) and is therefore the summation of Quarter 1 (Q1) through to Quarter 4 (Q4) for 2017. We will continue to make ongoing additions to this annual report based on the data collected through the REMM project and will engage with industry on how these metrics will be published over the coming months.

Table 1 Suppliers in the Retail Market

End of Q4 2017

	Network Operator							
	NIEN		PNGL		feDL		SGN	
	Electricity		Gas Greater Belfast		Gas Ten Towns		Gas West	
	Dom	I&C	Dom	I&C	Dom	I&C	Dom	I&C
Budget Energy								
Click Energy								
Electric Ireland								
Energia								
firmus energy								
Flogas								
Go Power								
Power NI								
SSE Airtricity								
Vayu								
Suppliers	5	8	2	6	1	6	1	2

Source: UR

2.2 Energy suppliers in NI energy market

The electricity and gas (in the Greater Belfast area) markets have been open to competition to domestic customers since 2007. However, there were no competing suppliers in the domestic market until 2010.

The Ten Towns area opened to gas competition for large I&C customers (those consuming over 732,000 kWh per annum) in October 2012, and to domestic and small I&C customers in April 2015.

The first gas connection to the West was a large I&C user during Q1 2017.

In summary there were **eight** active suppliers in the electricity market during 2017. In the gas markets there were **six** active suppliers during 2017 although not all of these suppliers are certified to operate in all sectors. The detail of the dates of entry for the suppliers in each of the retail market segments is available in Annex A. For more information about the retail energy market in NI, please visit:

<http://www.uregni.gov.uk/retail/>.

2.3 Wholesale market monitoring data

Readers should also be aware of the Electricity Wholesale Market Monitoring Report which provides an overview of the SEM and sets out recent trends in the market in relation to pricing, demand, scheduling and contract prices. It focuses in particular on the wholesale element of electricity prices, which makes up roughly 60% of customers' bills. These reports are prepared by the Market Monitoring Unit (MMU) within the UR in joint collaboration with the Commission for Regulation of Utilities (CRU).

3 Electricity

3.1 NI connections and total consumption

The table below shows electricity customer numbers¹ at end December 2017 and consumption from January to December 2017.

Table 2 Electricity connections and consumption per market segment

2017				
Customer groups	Number of connections	% share of connections in market sector	Consumption (GWh)	% share of consumption in market sector
Domestic prepayment	352,101	44.0%	1,190.8	41.6%
Domestic credit	448,401	56.0%	1,668.1	58.3%
Total Domestic	800,502	100%	2,859.0	100%
I&C < 20 MWh	48,468	66.9%	339.5	6.9%
I&C 20 – 49 MWh	13,029	18.0%	412.7	8.3%
I&C 50 – 499 MWh	9,884	13.6%	1,298.6	26.2%
I&C 500 – 1,999 MWh	828	1.1%	804.5	16.3%
I&C 2,000 – 19,999 MWh	255	0.4%	1,337.4	27.0%
I&C ≥ 20,000 MWh	20	0.03%	756.1	15.3%
Total I&C	72,484	100%	4,948.7	100%
Total	872,986		7,807.7	

Of the total customers in Northern Ireland, 91.7% belong to the domestic sector, while the remaining 8.3% are I&C customers. During 2017, this share translates into 36.6% and 63.4% respectively in terms of consumption.

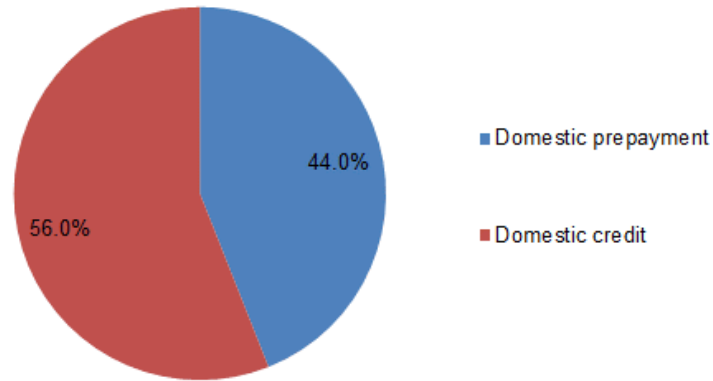
Within the domestic sector, 44.0% of the market use prepayment meters and 56.0% pay by credit.

Within the I&C sector, more than 99.9% of the customers are small and medium enterprises (consuming less than 19,999 MWh), with 84.8% of the I&C consumption. The remaining are Large Energy Users (LEU) connections, that represent 9.7% of the total NI volume for the year, and 15.3% of the I&C consumption.

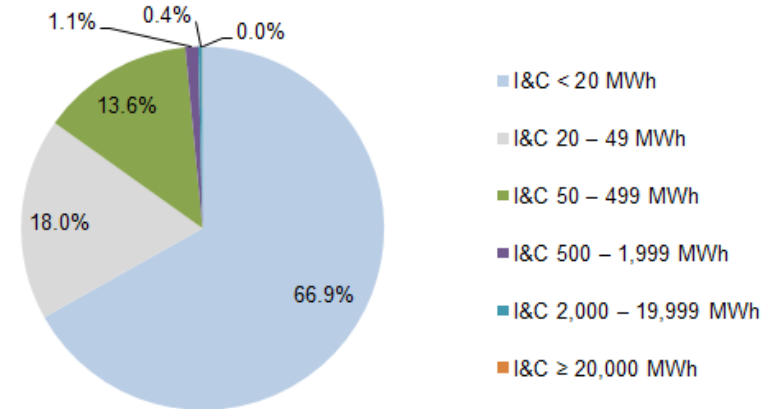
Source: NIEN

¹ Note that long term vacant sites are not included in connection numbers, and that combined premises are included in the <20MWh category

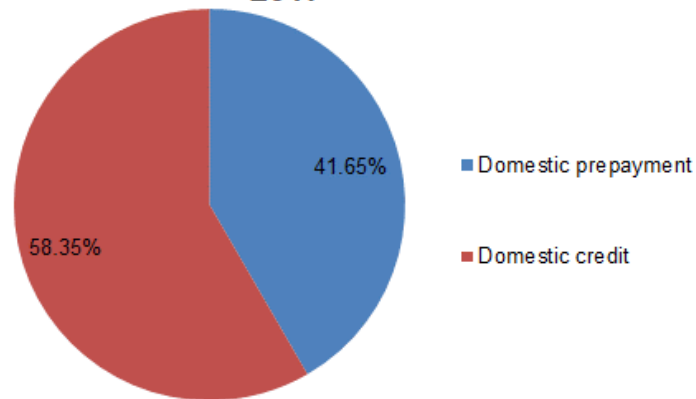
Electricity Connections - Total Domestic 2017



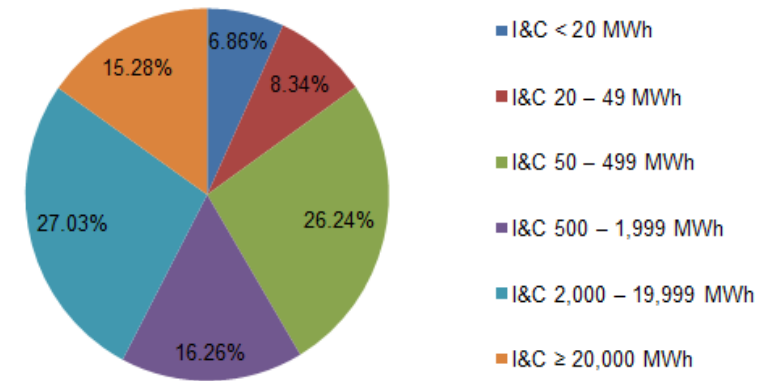
Electricity Connections - Total I&C 2017



Electricity Consumption (GWh) - Total Domestic 2017



Electricity Consumption (GWh) - Total I&C 2017



3.2 Electricity Market shares

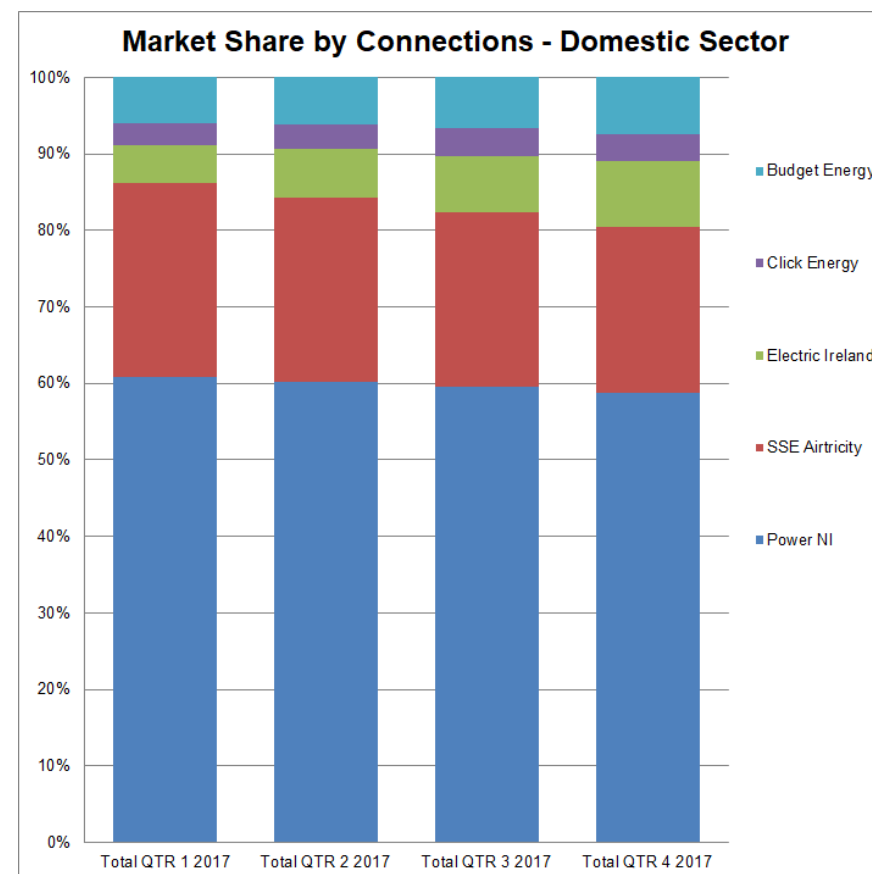
Electricity shares by connections²

During 2017 there were five domestic electricity suppliers in NI, and eight active suppliers in the I&C electricity market. The total number of domestic customers at the end of 2017 was 800,502. As is evident from the table below a significant number of domestic customers (58.7%) remain with the previously incumbent supplier Power NI, although this has dropped from 61.5% in 2016. The introduction of a number of new suppliers and the associated increase in competition indicates that the dynamic of the domestic market is gradually changing.

Table 3 Domestic market shares by connections

End of Q4 2017						
Domestic Suppliers	Domestic Prepayment		Domestic Credit		Domestic Total	
Power NI	159,280	45.2%	310,870	69.3%	470,150	58.7%
SSE Airtricity	80,423	22.8%	93,413	20.8%	173,836	21.7%
Electric Ireland	36,513	10.4%	32,300	7.2%	68,813	8.6%
Click Energy	25,728	7.3%	2,637	0.6%	28,365	3.5%
Budget Energy	50,157	14.2%	9,181	2.0%	59,338	7.4%
Dom Market	352,101	100%	448,401	100%	800,502	100%

Source: NIEN



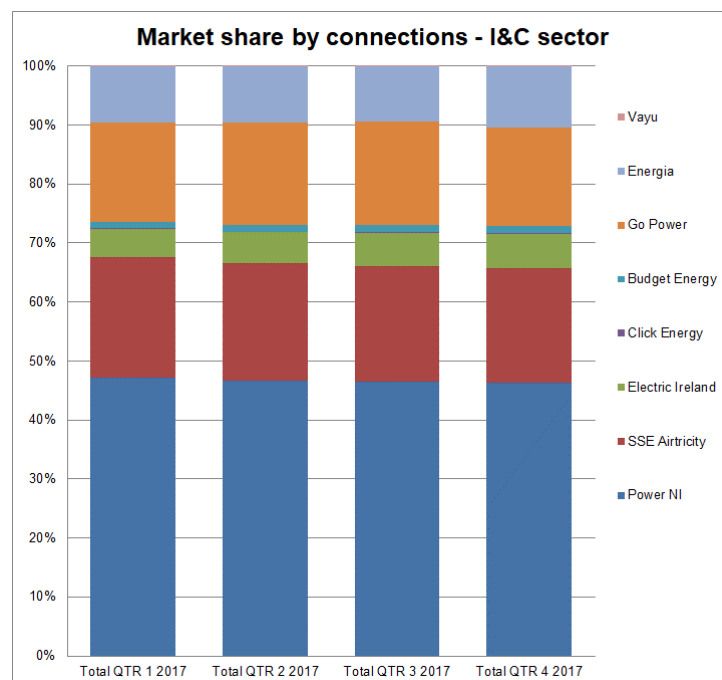
The market shares for 2017 illustrate a decrease for Power NI. For Q4 2017 Power NI supplied 45.2% of the domestic prepayment and 69.3% of the domestic credit market. This shows a decrease from 2016 when Power NI held 48.0% of the domestic prepayment and 71.9% of the domestic credit connections. The continued growth of the new entrants in the domestic market is clear, given that the non-incumbents now represent over 41.3% of total domestic connections in NI.

² Market shares figures do not include de-energised nor Long Term Vacant sites.

Table 4 I&C market shares by connections

End of Q4 2017														
I&C Suppliers	I&C < 20 MWh		I&C 20 – 49 MWh		I&C 50 – 499 MWh		I&C 500 – 1,999 MWh		I&C 2,000 – 19,999 MWh		I&C ≥ 20,000 MWh		I&C Total	
	Customer Count	Market Share (%)	Customer Count	Market Share (%)	Customer Count	Market Share (%)	Customer Count	Market Share (%)	Customer Count	Market Share (%)	Customer Count	Market Share (%)	Customer Count	Market Share (%)
Power NI	26,263	54.2%	4,500	34.5%	2,674	27.1%	92	11.1%	17	6.7%	0	0%	33,546	46.3%
SSE Airtricity	8,911	18.4%	3,197	24.5%	1,802	18.2%	109	13.2%	27	10.6%	5	25.0%	14,051	19.4%
Go Power	6,937	14.3%	2,457	18.9%	2,345	23.7%	269	32.5%	74	29.0%	5	25.0%	12,087	16.7%
Electric Ireland	2,054	4.2%	813	6.2%	1,159	11.7%	126	15.2%	53	20.8%	5	25.0%	4,210	5.8%
Energia	3,569	7.4%	1,848	14.2%	1,763	17.8%	226	27.3%	79	31.0%	5	25.0%	7,490	10.3%
Budget Energy	594	1.2%	197	1.5%	121	1.2%	0	0%	1	0.4%	0	0%	913	1.3%
Vayu	38	0.08%	1	0.01%	7	0.07%	6	0.7%	3	1.2%	0	0%	55	0.08%
Click Energy	102	0.21%	16	0.12%	13	0.13%	0	0%	1	0.4%	0	0%	132	0.18%
I&C Market	48,468	100%	13,029	100%	9,884	100%	828	100%	255	100%	20	100%	72,484	100%

Source: NIEN



The graph shows the trends in market shares (by customer numbers) for each active I&C supplier in NI by market segment, for the year 2017. Competition in the I&C market is more developed than the domestic sector, and consequently market shares are much more dispersed. Out of the eight active suppliers at the end of 2017, based on customer numbers, four of these suppliers had shares in excess of 10% in the largest consumption categories.

The graph to the left shows the trends in I&C market shares (by customer numbers) for each active supplier in NI for the year.

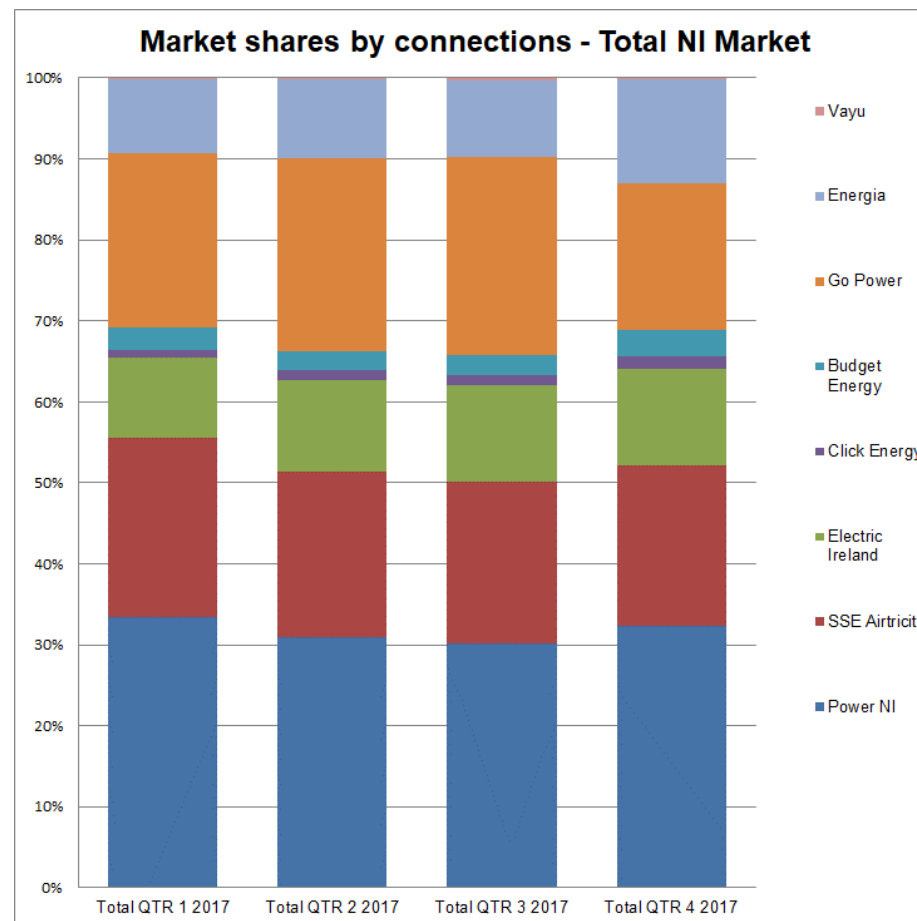
Table 5 Total NI market shares by connections

End of Q4 2017		
Suppliers	Total	
Power NI	503,696	57.7%
SSE Airtricity	187,887	21.5%
Go Power	12,087	1.4%
Electric Ireland	73,023	8.4%
Energia	7,490	0.9%
Click Energy	28,497	3.3%
Budget Energy	60,251	6.9%
Vayu	55	0.006%
Total Market	872,986	100%

Source: NIEN

When looking at the electricity retail market as a whole (domestic and I&C customers) Power NI’s leading position as the incumbent supplier remains at 57.7%, although this has decreased when compared to their 60.4% total market share at the end of 2016. This is attributable to the growth of market activity of the non incumbent suppliers including further growth by the new entrants to the market.

The graph to the right shows the trends in market shares (by customer numbers) for each active domestic and I&C supplier in NI for the previous year.



Electricity shares by consumption (GWh)

Table 6 Domestic market shares by consumption

Total Consumption 2017

Domestic Suppliers	Domestic Prepayment		Domestic credit		Domestic Total	
	GWh	%	GWh	%	GWh	%
Power NI	527.8	44.3%	1,104.3	66.2%	1,632.1	57.1%
SSE Airtricity	321.4	27.0%	436.0	26.1%	757.4	26.5%
Electric Ireland	96.7	8.1%	91.6	5.5%	188.3	6.6%
Click Energy	83.9	7.0%	8.3	0.5%	92.2	3.2%
Budget Energy	161.0	13.5%	27.9	1.7%	188.9	6.6%
Dom Market	1,190.8	100%	1,668.1	100%	2,859.0	100%

Source NIEN

In 2017, Power NI’s share of the market by consumption was 44.3% for domestic prepayment and 66.2% for domestic credit, this shows a decrease when compared to 2016 when Power NI’s domestic prepayment market share was 48.0% and domestic credit was 69.0%.

The graph to the right shows the trends in market shares (by consumption) for each active domestic supplier in NI for 2017.

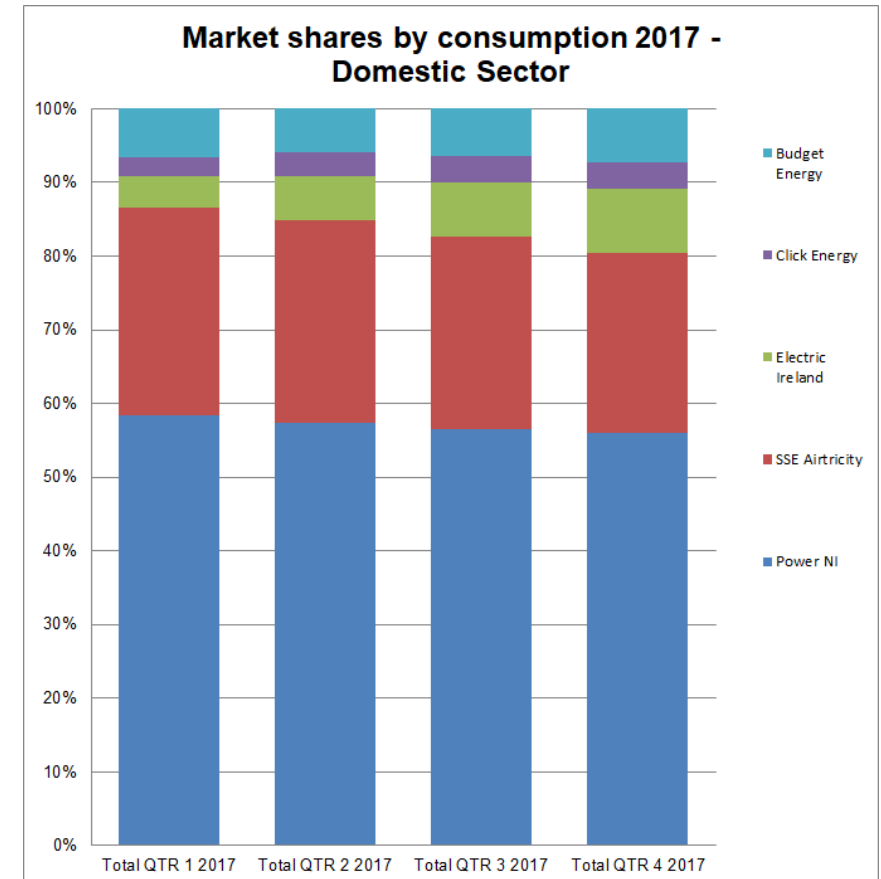


Table 7 I&C market shares by consumption

Total Consumption 2017

I&C Suppliers	I&C < 20 MWh		I&C < 20 – 49 MWh		I&C 50 – 499 MWh		I&C 500 – 1,999 MWh		I&C 2,000 – 19,999 MWh		I&C ≥ 20,000 MWh		I&C Total	
	GWh	%	GWh	%	GWh	%	GWh	%	GWh	%	GWh	%	GWh	%
Power NI	162.7	47.9%	143.9	34.9%	310.2	23.9%	91.6	11.4%	143.1	10.7%	0.0	0.0%	851.5	17.2%
SSE Airtricity	67.4	19.8%	101.7	24.7%	239.8	18.5%	99.7	12.4%	177.0	13.2%	166.5	22.0%	852.1	17.2%
Go Power	60.9	18.0%	81.5	19.7%	349.2	26.9%	314.3	39.1%	476.0	35.6%	417.8	55.3%	1,699.6	34.3%
Electric Ireland	15.8	4.7%	24.0	5.8%	163.2	12.6%	115.4	14.3%	264.0	19.7%	106.1	14.0%	688.6	13.9%
Energia	29.0	8.5%	55.2	13.4%	223.5	17.2%	176.6	22.0%	258.6	19.3%	65.7	8.7%	808.6	16.3%
Budget Energy	3.3	1.0%	6.0	1.5%	10.4	0.8%	0.0	0.0%	6.2	0.46%	0.0	0.0%	25.9	0.5%
Vayu	0.08	0.024%	0.02	0.005%	1.0	0.079%	6.9	0.8%	9.5	0.7%	0.0	0.0%	17.5	0.4%
Click Energy	0.4	0.12%	0.36	0.08%	1.2	0.094%	0.0	0%	3.0	0.22%	0.0	0.0%	5.0	0.1%
I&C Market	339.5	100%	412.7	100%	1,298.6	100%	804.5	100%	1,337.4	100%	756.1	100%	4,948.7	100.0%

Source: NIEN

The main suppliers by consumption in the I&C sector in 2017 were Go Power (34.3%), SSE Airtricity (17.2%), Power NI (17.2%), Energia (16.3%) and Electric Ireland (13.9%).

The graph to the right shows the trends in market shares (by consumption) for each active I&C supplier in NI during 2017.

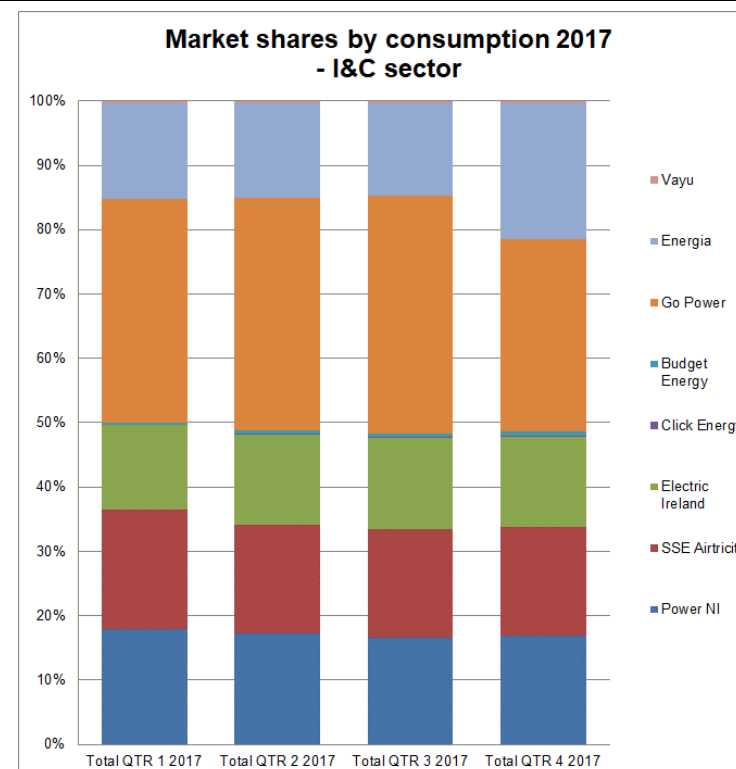


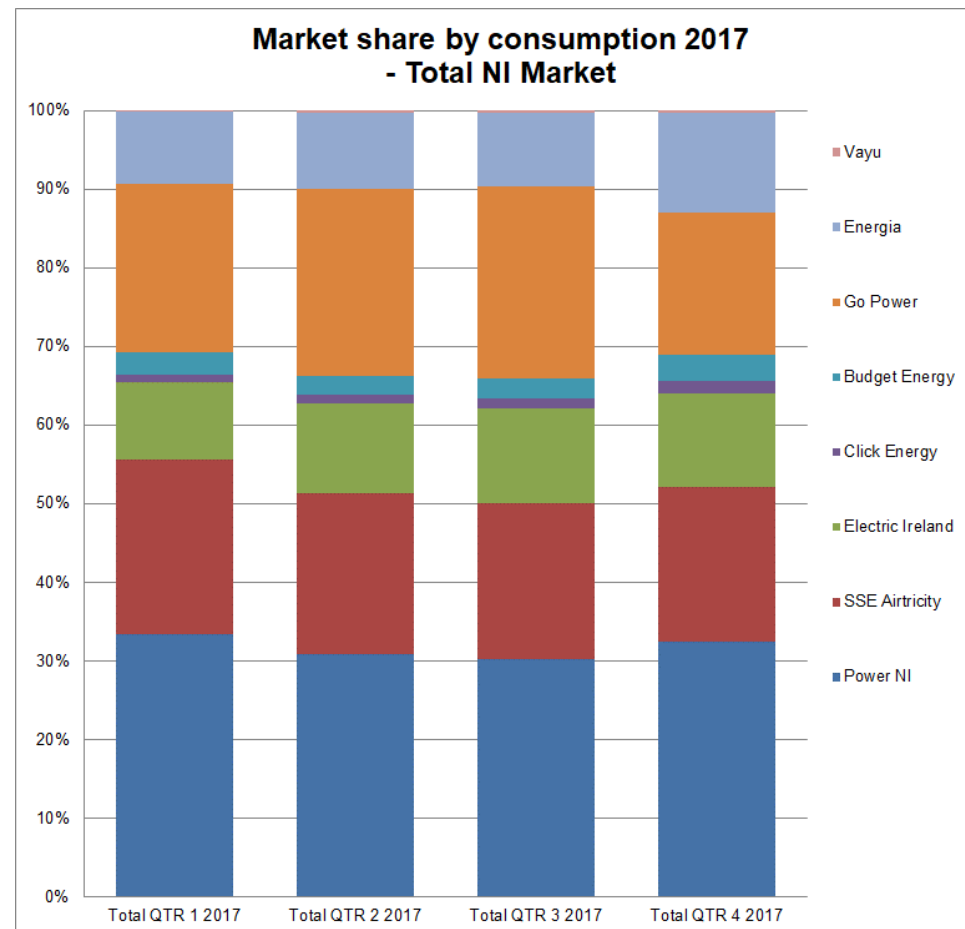
Table 8 Total NI market shares by consumption

Total Consumption 2017		
Total Market	Total	
	GWh	%
Power NI	2,483.6	31.8%
SSE Airtricity	1,609.5	20.6%
Go Power	1,699.6	21.7%
Electric Ireland	876.9	11.2%
Energia	808.6	10.4%
Click Energy	97.2	1.2%
Budget Energy	214.8	2.7%
Vayu	17.5	0.2%
Total Market	7,807.7	100%

Source: NIEN

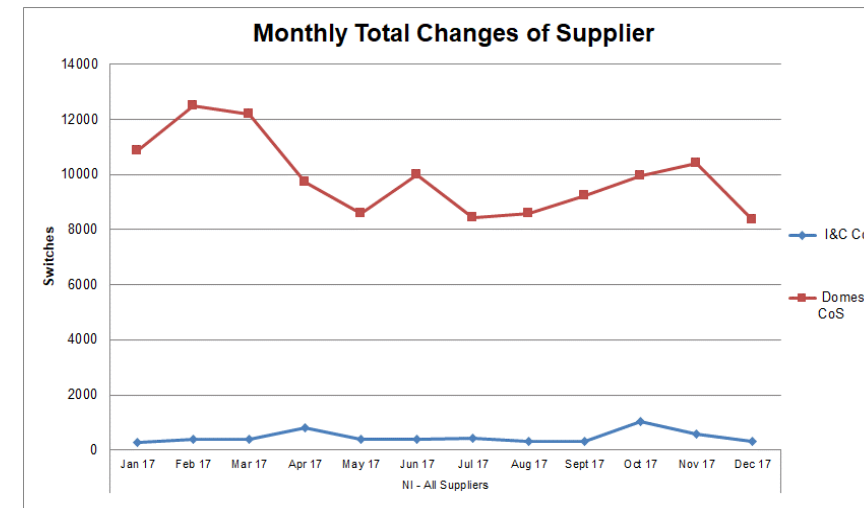
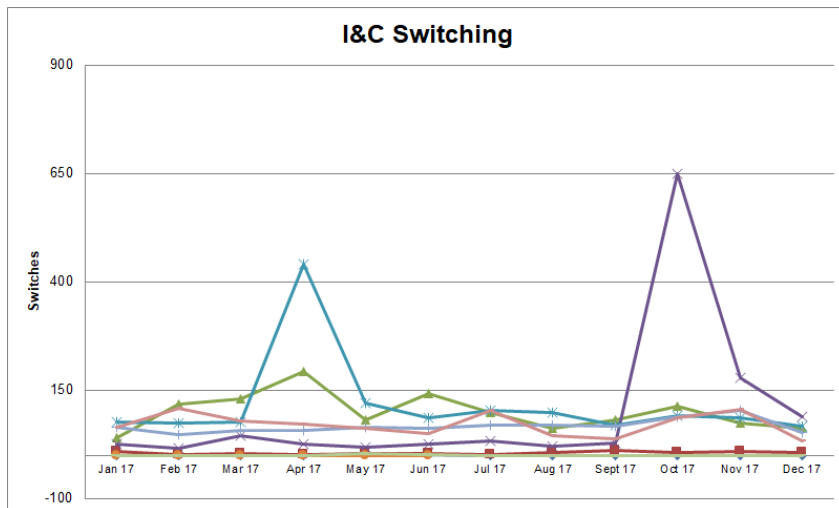
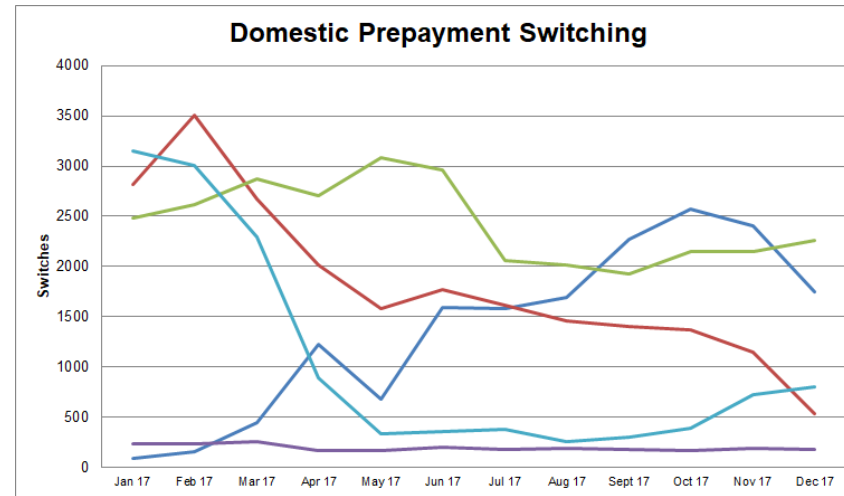
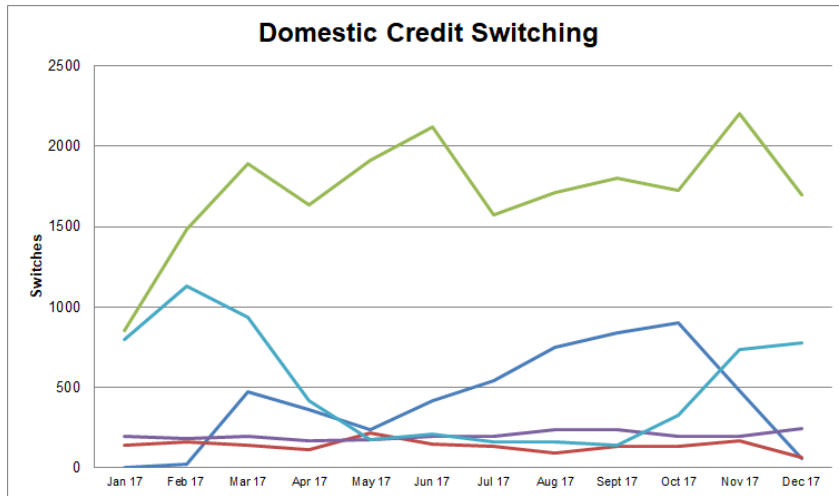
Electricity consumption in NI retail market for 2017 was over 7,807 GWh, which indicates a year on year increase when compared to 7,793.9 GWh consumed in 2016.

The graph to the right reflects the trends in market shares (by total consumption) for each active domestic and I&C supplier in NI during 2017.



3.3 Electricity market activity

The line charts below reflect the change of customer numbers (gains per supplier), per market segment and anonymised supplier.



The table below shows market activity through changes of supplier (CoSs) on a quarterly basis in the whole NI market split by domestic and I&C. These percentages are calculated using the number of quarterly switches divided by the number of customers at the end of the quarter in the relevant market.

Table 9 Electricity market activity

Total 2017

Period	Domestic Switching		I&C Switching		Total Switching	
2017 Q1	35,543	4.5%	1,060	1.5%	36,603	4.2%
2017 Q2	28,253	3.6%	1,574	2.2%	29,827	3.4%
2017 Q3	26,230	3.3%	1,044	1.4%	27,274	3.1%
2017 Q4	28,700	3.6%	1,944	2.7%	30,644	3.5%
2017 Total	118,726	14.3%	5,622	7.7%	124,348	14.2%

Source: NIEN

The number of domestic switches which took place in 2017 has decreased slightly year on year, with an average of below 10,000 switches per month. The percentage of domestic switching was 14.8% compared with 15.6% for 2016.

The I&C sector market activity has also decreased when comparing year on year, with a switching rate of 7.7% (from 10.6% in 2016).

3.4 Electricity prices

For the electricity prices section, we follow Eurostat's format and methodology. As a result the average prices for NI are comparable with prices in other EU countries (those published in BEIS's Quarterly Energy Prices reports³ and Eurostat data base⁴) once these figures have been converted to GBP.

The base figures are all submitted on a quarterly basis by suppliers, split by domestic and non domestic (I&C). The UR performs a high level reasonableness check of the base figures, but the suppliers are responsible for the accuracy of the information that is provided to the UR. The base figures are as follows:

- **Volume** of electricity sold to consumers.
- The **value**, or revenue gained from the sale, split into three categories: excluding all taxes, excluding VAT, and including all taxes.
- The **number** of customers supplied in that particular size category.

The volume and value are used to calculate a NI quarterly average value per size band. This value per unit (per size band) is what we refer to in this paper as "price". For clarity we do not receive from suppliers the actual price paid by their customers. Instead we calculate the average value or revenue collected per unit in that particular size category, as per the Eurostat methodology.

As the Eurostat figures are published on a semester basis (semester 1 (S1) January to June and semester 2 (S2) July to December) we therefore average the two relevant quarters to obtain the comparable six-month period for NI.

³ <https://www.gov.uk/government/collections/quarterly-energy-prices>

⁴ <http://ec.europa.eu/eurostat/web/energy/data/database>

It should be noted that the comparability of the derived NI prices to the other Member States can be greatly affected by fluctuations in the Euro GBP exchange rate. For the purposes of tariff comparisons we convert the EU tariff data from Euro to GBP using the monthly average exchange rate applicable for the semester (published by Eurostat). Therefore tariff movements and comparisons between NI and other Member States can be impacted by both an increase and decrease in a tariff and/or also by any variation in exchange rates.

The pricing data detailed in this ATR provides a comparison for the period January to June 2017 (semester 1) and July to December 2017 (semester 2).

Domestic price comparison with EU

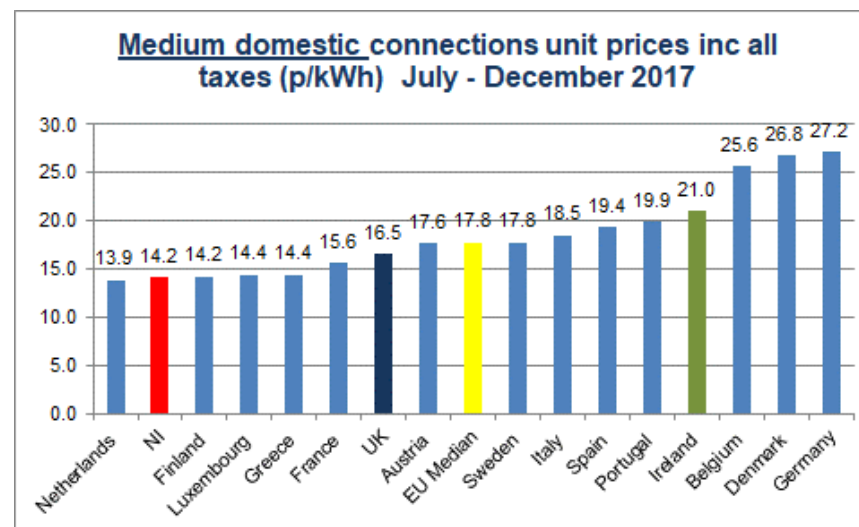
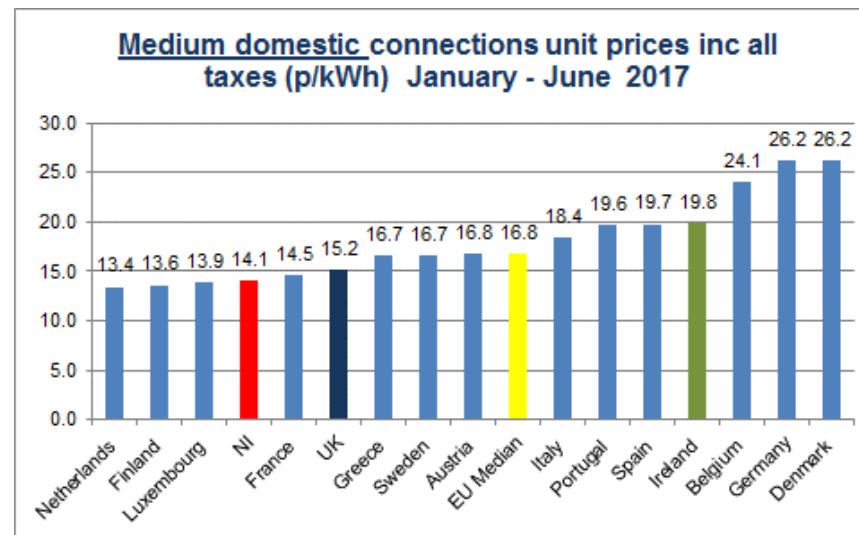
In the domestic graphs shown to the right, we use unit prices which include Climate Change Levy (CCL) and include VAT as this reflects the final prices paid by domestic Customers. The medium sized domestic customers (annual consumption of between 2,500 and 4,999 kWh) have been selected for the purpose of analysis, as this consumption category reflects the majority of domestic customers in NI.

In S1 2017 the NI price was significantly below the EU median, and ranked among the cheapest in Europe. The NI domestic price for this semester is less than that of GB and considerably less than RoI.

It should be noted that Power NI announced a 5.6% increase in their regulated domestic tariff, effective from 1st October 2017.

In S2 2017 the NI price remained significantly below the EU median, and now ranks among the cheapest in Europe. The NI

domestic price is also considerably less than that of GB and RoI. This is largely attributable to exchange rate fluctuations between the two semesters as well as movements in the tariffs.



I&C price comparison with EU

The following graphs show I&C electricity prices in the 15 EU countries (converted to GBP) and in NI, per consumption size bands (following standard EU categorisation). The I&C graphs use unit prices which include Climate Change Levy (CCL) but exclude VAT, as VAT is a refundable expense for many businesses. This therefore reflects the final prices paid by I&C customers. We amalgamate the two largest categories of annual consumption (large and very large connections) to avoid any confidentiality issues in sectors where there are a small number of customers and suppliers involved.

During both S1 and S2 2017 the Very Small I&C Category ranked NI prices as one of the most reasonable in the EU and also significantly lower than RoI (two thirds of I&C connections in NI are in this size category). For the medium and I&C customers, prices during the year are marginally above those in RoI but are lower than in the UK overall. In the second semester of 2017 (S2 2017) the NI Large and Very Large I&C price for RoI and NI were aligned, the graphs on the following page illustrate a slight increase for RoI from S1 2017 to S2 2017 while NI remained relatively stagnant. The following tables show the percentage of connections and consumption for the relevant period end (detailed in the I&C graphs S1 and S2 2017).

Table 10 Electricity market % by I&C consumption band

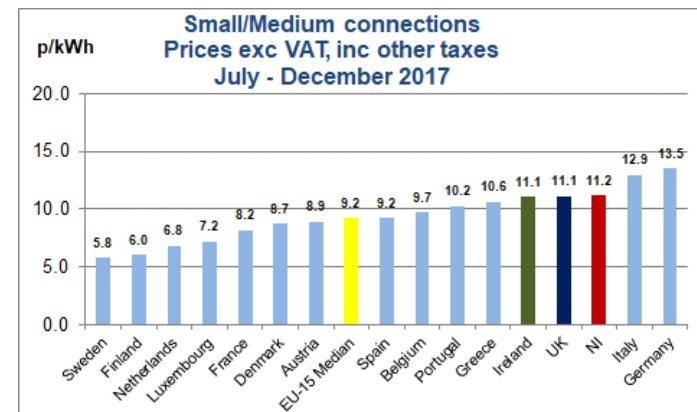
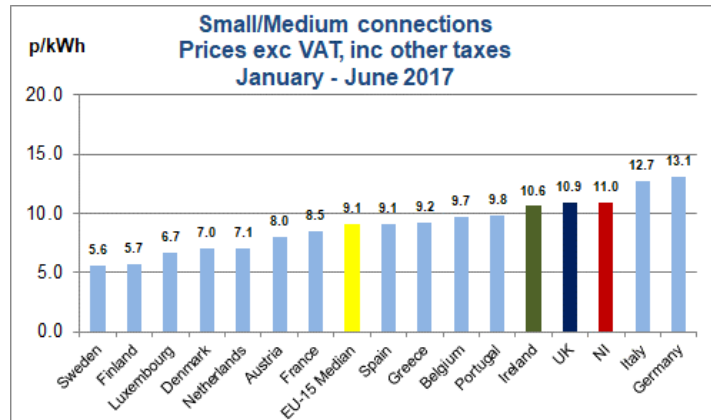
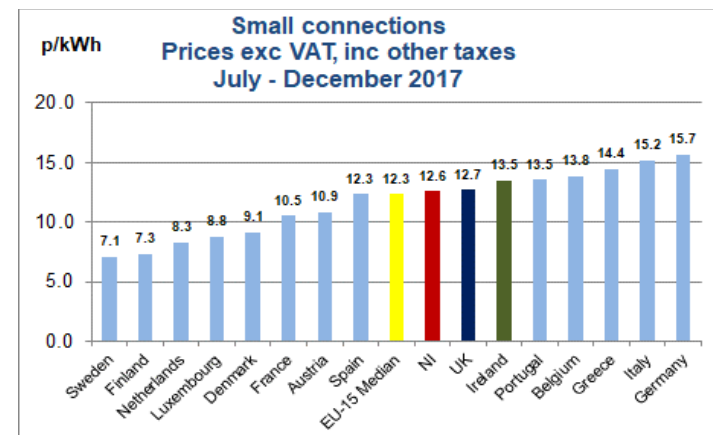
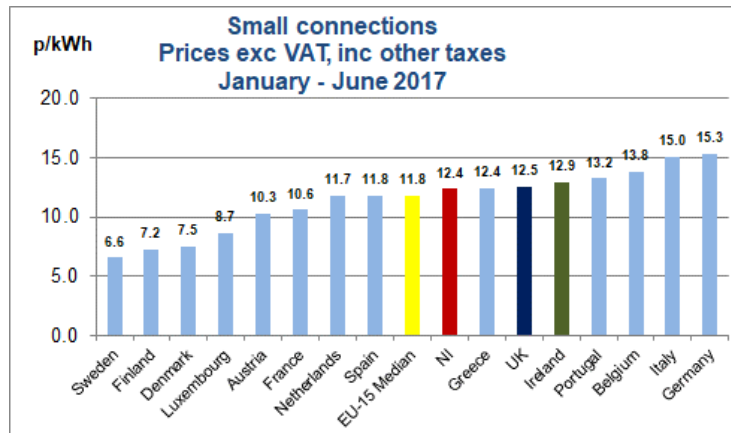
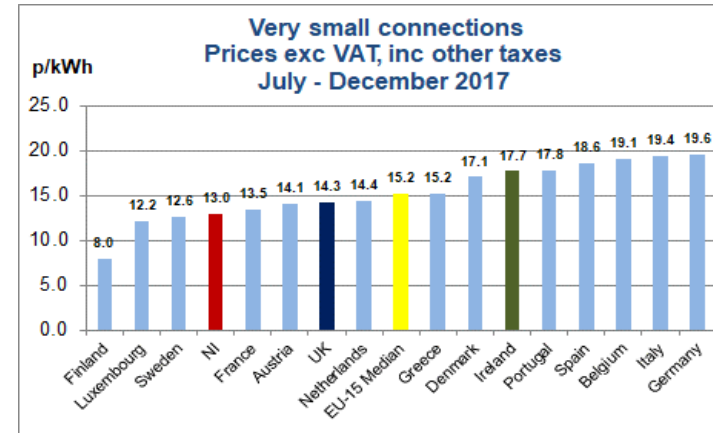
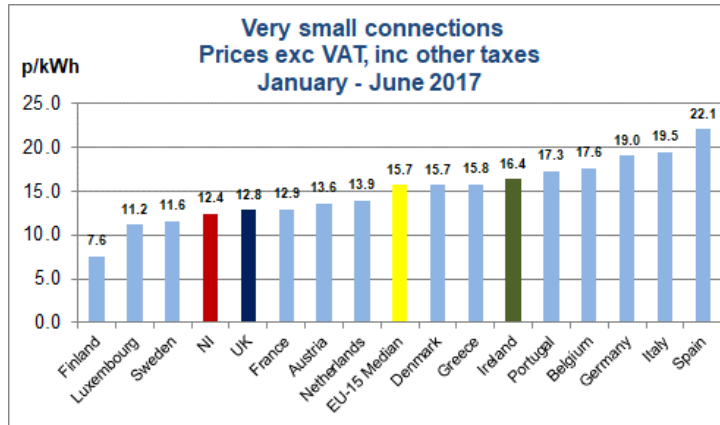
End of Q2 2017 (June 2017)

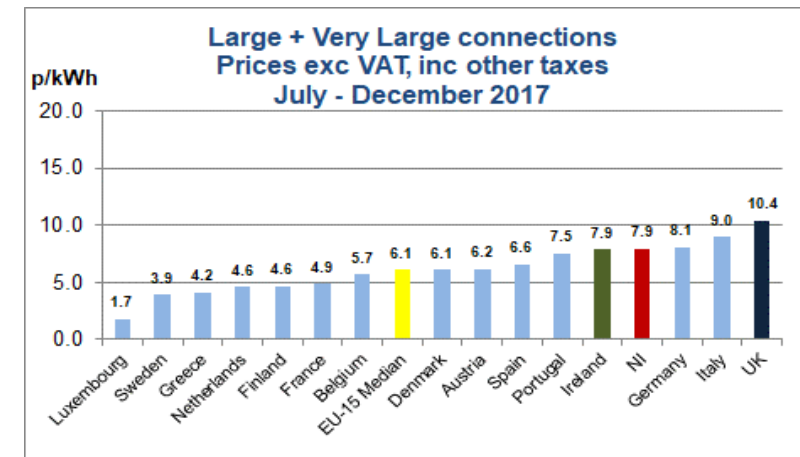
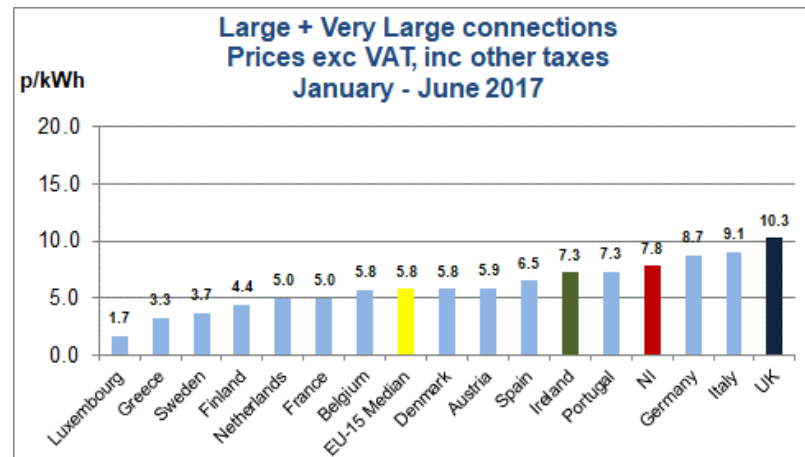
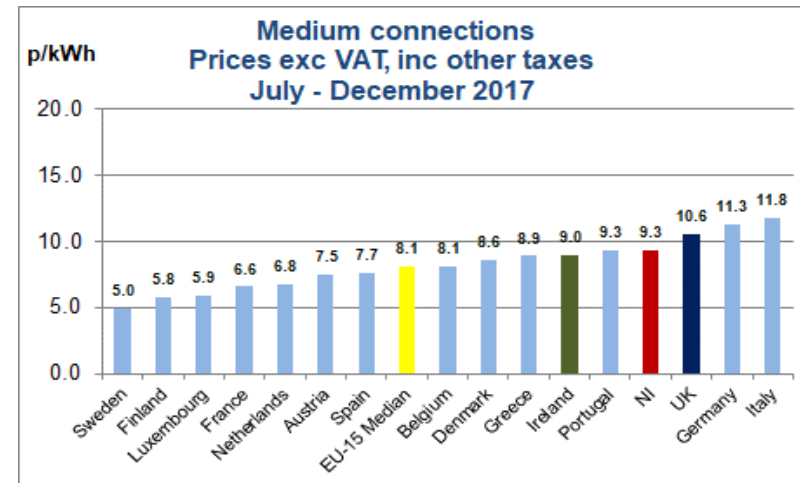
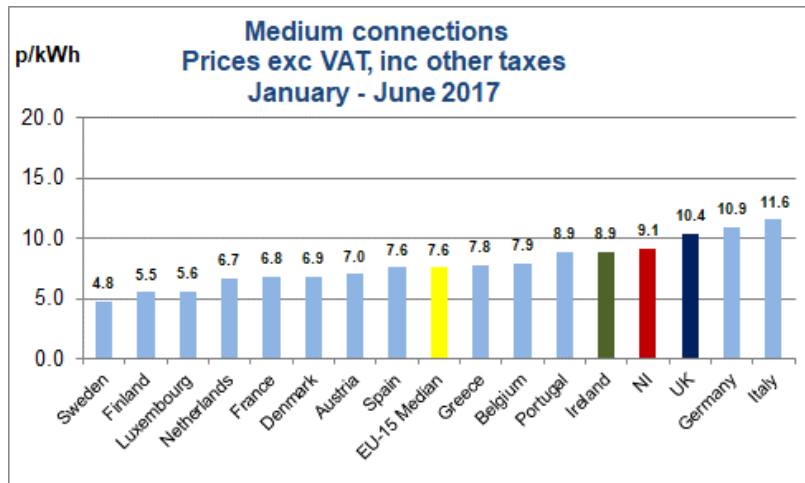
Size of customer	Annual consumption bands (MWh)	% of I&C connections ⁵	% of I&C consumption	I&C connection numbers
Very small	< 20	66.7%	8.3%	47,920
Small	20 – 499	31.7%	32.7%	22,838
Small / Medium	500 – 1,999	1.2%	16.2%	842
Medium	2,000 – 19,999	0.4%	27.4%	254
Large & Very Large	>20,000	0.03%	15.5%	19

End of Q4 2017 (December 2017)

Size of customer	Annual consumption bands (MWh)	% of I&C connections ⁶	% of I&C consumption	I&C connection numbers
Very small	< 20	66.9%	7.3%	48,468
Small	20 – 499	31.6%	36.3%	22,913
Small / Medium	500 – 1,999	1.1%	16.1%	828
Medium	2,000 – 19,999	0.4%	25.6%	255
Large & Very Large	>20,000	0.03%	14.7%	20

Source: NIEN





Source: NI electricity suppliers, Eurostat and UR internal calculations

4 Gas in the Greater Belfast area

4.1 Connections and consumption in the Greater Belfast area

The table below shows gas connection numbers in the Greater Belfast area at the end of December 2017 and the consumption in this area during January to December 2017.

Table 11 Gas connections and consumption per market segment in the Greater Belfast area

Connections as of end of Q4 2017
Total Consumption 2017

Market sector	Number of connections	% share of connections in sector	Consumption (MWh)	% share of consumption in sector
Domestic prepayment	125,509	62.4%	1,147,852	49.5%
Domestic credit	67,801	33.7%	1,170,656	50.5%
I&C < 73,200 kWh	7,789	3.9%		
Total Domestic and Small I&C⁷	201,099	100%	2,318,508	100%
I&C 73,200 to 732,000 kWh	2,789	87.5%	606,873	31.5%
I&C 732,001 to 2,196,000 kWh	299	9.4%	307,018	15.9%
I&C > 2,196,000 kWh	100	3.1%	1,015,110	52.6%
Medium & Large I&C⁸	3,188	100%	1,929,002	100%
Total	204,287		4,247,510	

Source: PNGL

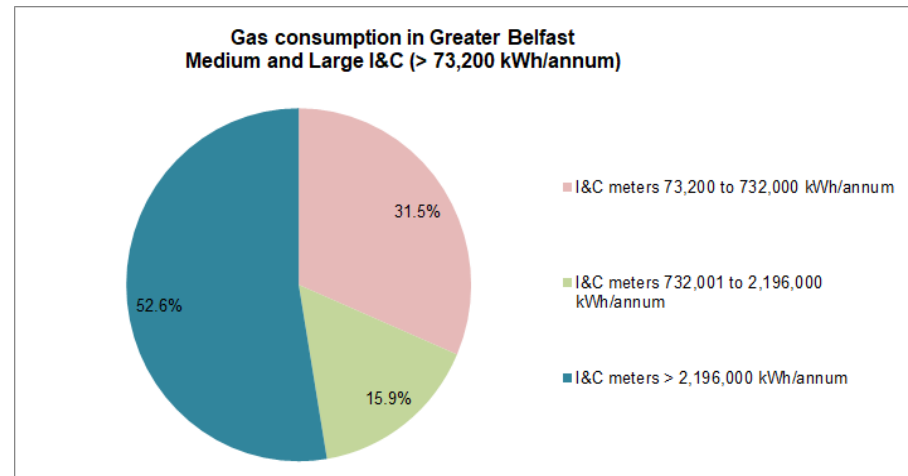
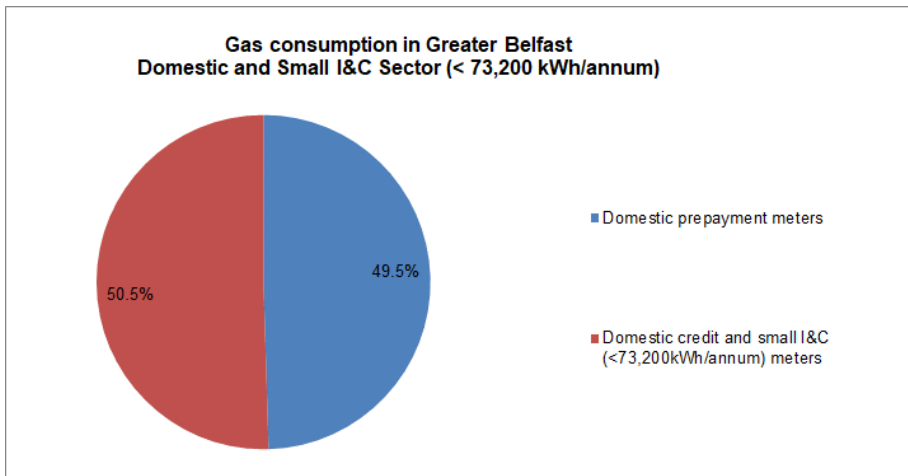
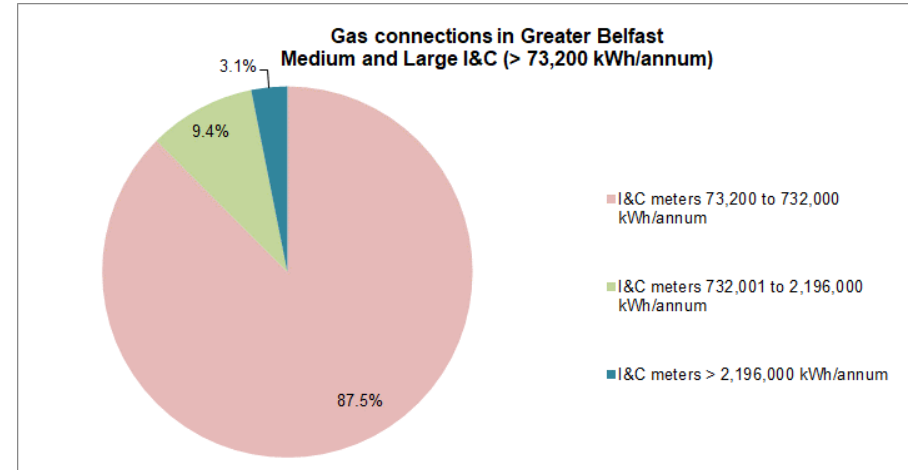
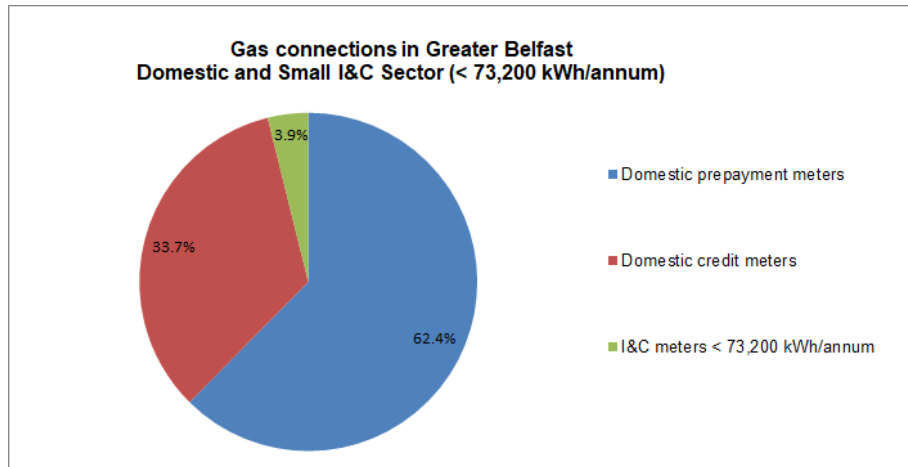
At the end of 2017 the domestic and small I&C connections represent 98.4% of the total connections and 54.5% by consumption. The remaining 1.6% of connections are medium and large I&C which represent 45.5% of consumption.

Within the domestic sector, 64.9% of the connections use prepayment meters and 35.1% use credit meters to pay for their gas.

⁷ The domestic and small I&C sector relates to any customers using less than 73,200 kWh per annum. The consumption information for domestic credit and small I&C are combined as this information is not available separately.

⁸ The medium and large I&C sector relates to any customers with annual consumption that is greater than or equal to 73,200 kWh per annum.

The charts below show the numbers of gas connections in the Greater Belfast area at the end of December 2017 and the consumption in this area during January to December 2017.



4.2 Gas market shares in the Greater Belfast area

This section provides information on the connection numbers and consumption, by supplier, in the Greater Belfast area. The market shares in terms of connections are as at the end of December 2017 and the market shares in terms of consumption are for the period January to December 2017. There are five suppliers in the domestic and small I&C sector, although only two of these suppliers are active in the domestic market. In the medium and large I&C market there are currently six active suppliers.

Gas shares by connections numbers

The table below shows the market shares for each supplier within the domestic and small I&C sector in the Greater Belfast area. The market shares are shown as number of connections per supplier and also as a percentage share within the sector (as at the end of December 2017).

Table 12 Domestic and small I&C⁹ market shares by connections

Connections as of end of Q4 2017

Supplier	Domestic prepayment		Domestic Credit		I&C < 73,200 kWh		Total for Domestic and Small I&C	
	Connections	%	Connections	%	Connections	%	Connections	%
SSE Airtricity	90,205	71.9%	54,695	80.7%	5,115	65.6%	150,015	74.6%
firmus energy	35,304	28.1%	13,106	19.3%	854	11.0%	49,264	24.5%
Vayu	0	0%	0	0%	14	0.2%	14	0.01%
Go Power	0	0%	0	0%	551	7.1%	551	0.3%
Flogas	0	0%	0	0%	1,265	16.2%	1,255	0.6%
Total	125,509	100%	67,801	100%	7,799	100%	201,099	100%

Source: PNGL

In terms of market shares by connections, SSE Airtricity (the incumbent supplier) retains a significant share of the domestic and small I&C market of currently 74.6%.

Flogas and Go Power market shares, in terms of connection numbers, are gradually increasing each quarter with a combined share of the domestic and small I&C market of 0.9%.

⁹ The domestic and small I&C sector relates to any customers using less than 73,200 kWh per annum.

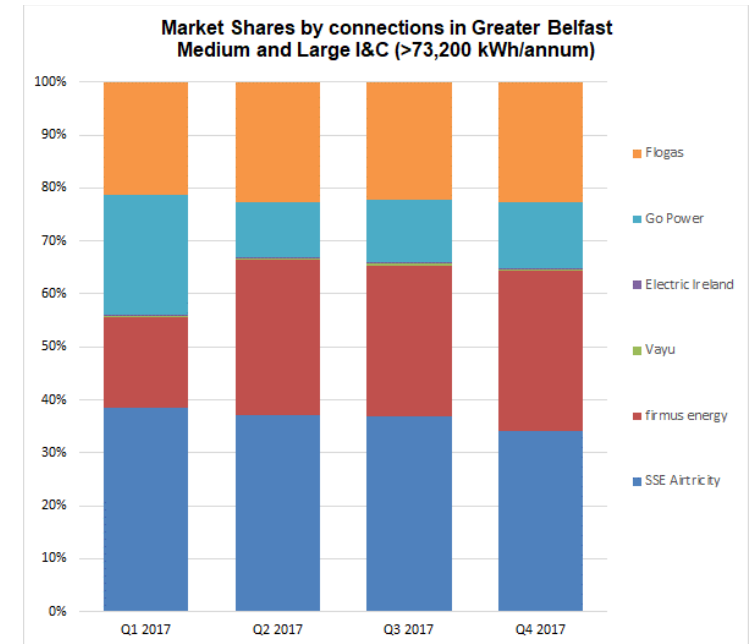
The table below shows the market shares for each supplier within the medium and large I&C sector (i.e. I&Cs with consumption over 73,200 kWh per annum) in the Greater Belfast area at the end of December 2017. The corresponding graph shows the change in market shares by supplier within the same sector during 2017.

Table 13 Medium and large I&C¹⁰ market shares by connections

Connections as of end of Q4 2017

Supplier	I&C 73,200 to 732,000 kWh		I&C 732,001 to 2,196,000 kWh		I&C > 2,196,000 kWh		Total for Medium and Large I&C	
SSE Airtricity	955	34.2%	101	33.8%	32	32.0%	1,088	34.1%
firmus energy	828	29.7%	100	33.4%	34	34.0%	962	30.2%
Vayu	10	0.4%	1	0.4%	0	0%	11	0.3%
Electric Ireland	0	0%	0	0%	6	6.0%	6	0.2%
Go Power	321	11.5%	60	20.1%	20	20.0%	401	12.6%
Flogas	675	24.2%	37	12.4%	8	8.0%	720	22.6%
Total	2,789	100%	299	100%	100	100%	3,188	100%

Source: PNGL



Competition in the medium and large I&C market is more active in the Greater Belfast area. At the end of 2017, Go Power and Flogas had 12.6% and 22.6% share of the medium and large I&C market respectively. Firmus have made considerable year on year gains, from a market share of 17.2% at the end of 2016 to 30.2% at the end of 2017.

¹⁰ The medium and large I&C sector relates to any customers with annual consumption that is greater than or equal to 73,200 kWh per annum.

Gas shares by consumption¹¹

This section provides information on the consumption, by supplier, in the Greater Belfast area during 2017. The table below shows the market shares for each supplier within the domestic and small I&C sector in the Greater Belfast area.

Table 14 Domestic and small I&C¹² market shares by consumption

Total Consumption 2017

Supplier	Total for Domestic and Small I&C Sector	
	(MWh)	% share
SSE Airtricity	1,654,322	71.4%
firmus energy	619,123	26.7%
Vayu	375	0.02%
Go Power	16,150	0.7%
Flogas	28,538	1.2%
Total	2,318,508	100%

Source: PNLG

SSE Airtricity has retained the majority of the domestic and small I&C market share in the Greater Belfast area during 2017. Based on consumption their percentage market share in 2017 was 71.4%.

firmus energy's market share for 2017 was 26.7%. The market share of the remaining suppliers based on consumption levels continues to be minimal as they are not active in the domestic market and supply only to a limited number of small I&C customers.

¹¹ Gas consumption is presented in this QTR in MWh.

¹² The domestic and small I&C sector relates to any customers using less than 73,200 kWh per annum.

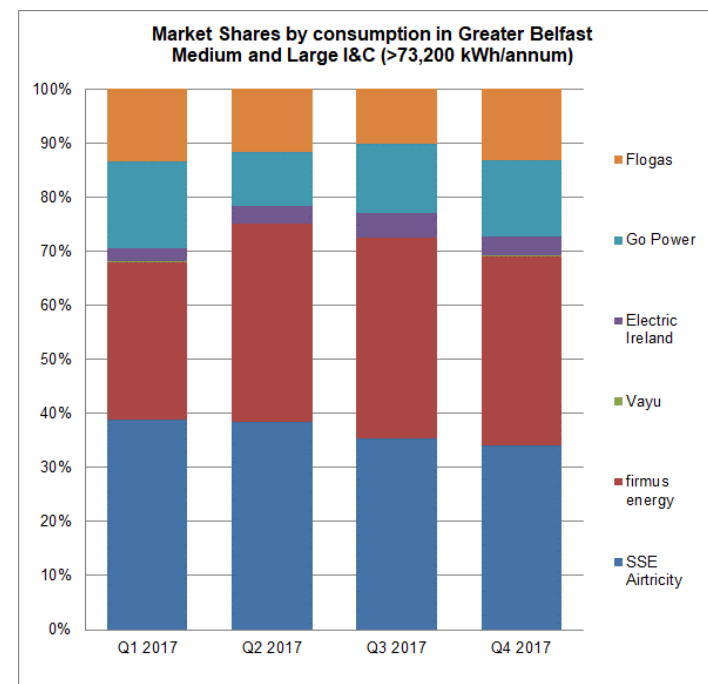
The table below shows the market shares for each supplier within the medium and large I&C sector (i.e. those using at least 73,200 kWh per annum) in the Greater Belfast area during 2017. The corresponding graph shows the change in market shares by supplier within the same sector during 2017.

Table 15 Medium and large I&C¹³ market shares by consumption

Total Consumption 2017

Supplier	I&C 73,200 to 732,000 kWh		I&C 732,001 to 2,196,000 kWh		I&C > 2,196,000 kWh		Total for Medium and Large I&C	
	(MWh)	% share	(MWh)	% share	(MWh)	% share	(MWh)	% share
SSE Airtricity	213,628	35.2%	119,678	39.0%	376,241	37.1%	709,547	36.8%
firmus	152,808	25.2%	100,788	32.8%	397,257	39.1%	650,852	33.7%
Vayu	1,854	0.3%	1,318	0.4%	0	0%	3,171	0.2%
Electric Ireland	0	0%	0	0%	60,835	6.0%	60,835	3.2%
Go Power	97,436	16.1%	46,491	15.1%	121,485	12.0%	265,412	13.8%
Flogas	141,148	23.3%	38,743	12.6%	59,292	5.8%	239,184	12.4%
Total	606,873	100%	307,018	100%	1,015,110	100%	1,929,002	100%

Source: PNGL



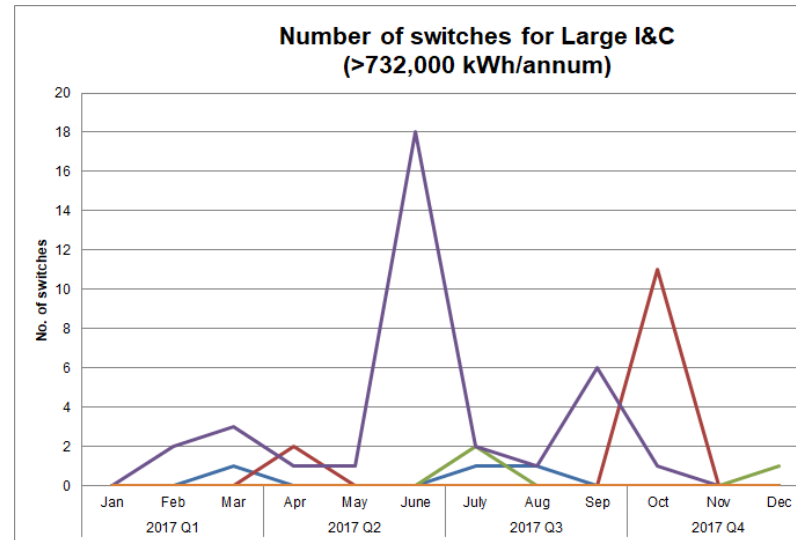
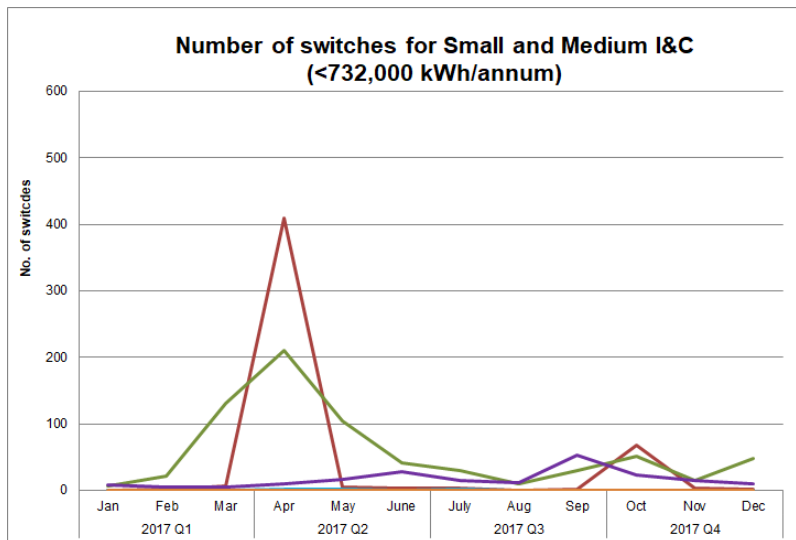
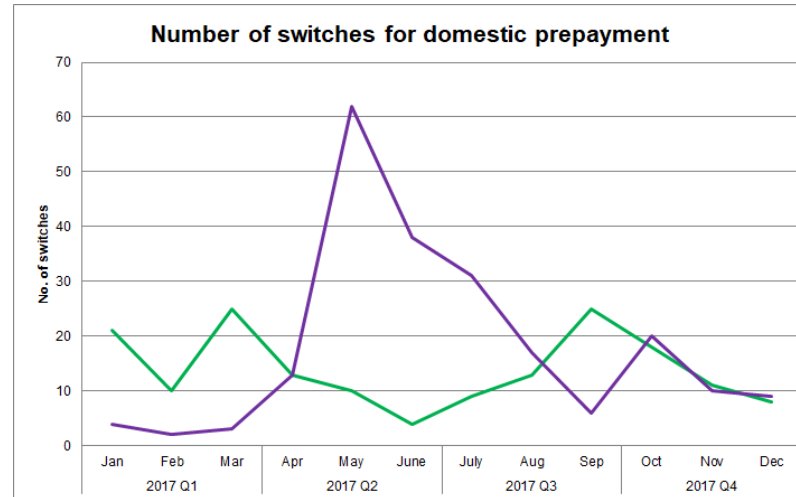
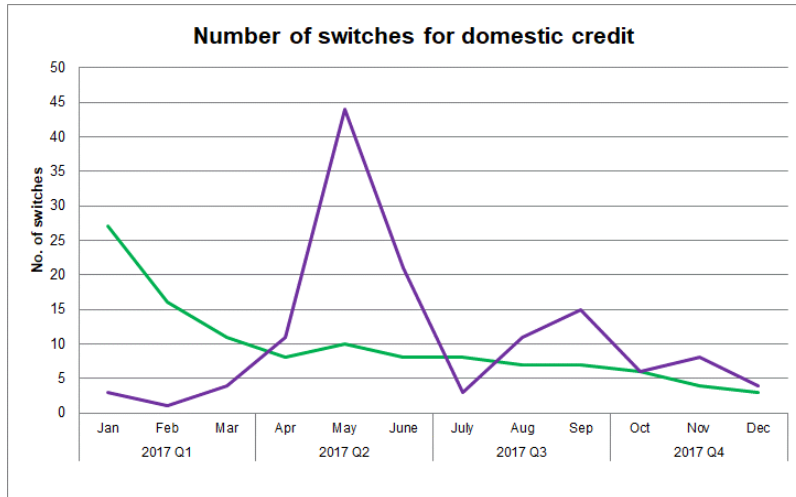
Market share by consumption fluctuates throughout the year due to the movement of customers between suppliers, and also due to the amount of gas consumed by each customer during different seasons (as gas usage can be weather dependent for many, but not all, customers).

SSE Airtricity are the largest supplier in the Medium and Large I&C market with 36.8%, closely followed by firmus at 33.7%. New market entrants continue to display growth in this market segment with Go Power and Flogas market shares, by consumption, 13.8% and 12.4% respectively in 2017.

¹³ The medium and large I&C sector relates to any customers with annual consumption that is greater than or equal to 73,200 kWh per annum.

4.3 Market activity in the Greater Belfast area

The line charts below reflect the number of switching gains per market sector in the Greater Belfast area. The switching gains are displayed by supplier; however the supplier names have been anonymised. Note that prepayment switches, within the domestic sector, include switches back to the previous supplier in cases where the customer has not taken the required action to complete their switch.



There are only two active suppliers in the domestic market and market switching has continued at a low level. The I&C graphs above represent the split between the small and medium I&C customers (i.e. customers consuming less than 732,000 kWh per annum) and large I&C consumers (i.e. consuming more than 732,000 kWh per annum). Following a spike in switching in the small and medium I&C sector (<732,000 kWh/annum) at the end of Q1 2017 the switching levels returned to lower levels for Q3 and Q4 2017.

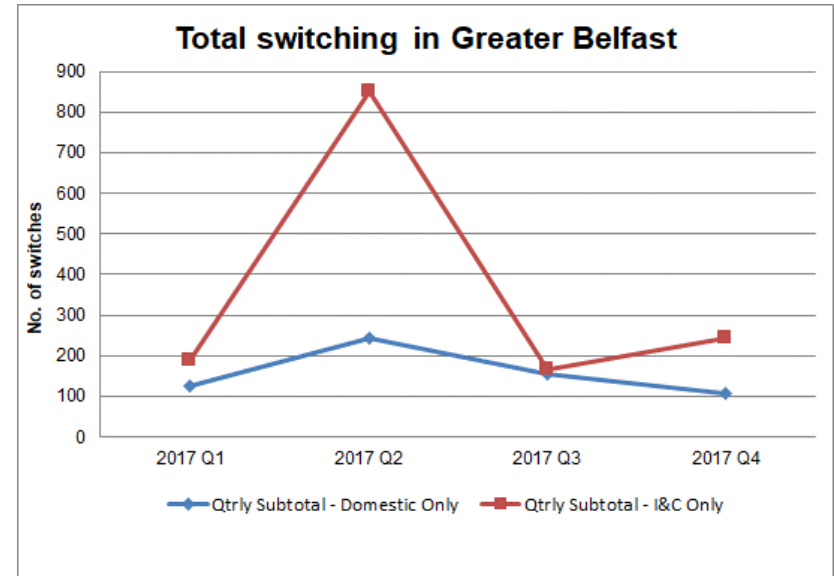
The table below shows market activity through the number of customer switches on a quarterly basis in the Greater Belfast gas market and the associated percentage switching rate. The switching rate percentages are calculated using the number of quarterly switches divided by the number of customers at the end of the quarter in the relevant market.

Table 16 Market activity in the Greater Belfast area

Period	Domestic Switching		I&C Switching		Total Switching	
2017 Q1	127	0.1%	188	1.7%	315	0.2%
2017 Q2	242	0.1%	852	7.8%	1,094	0.5%
2017 Q3	154	0.1%	167	1.5%	321	0.2%
2017 Q4	107	0.1%	245	2.3%	352	0.2%
2017 Total	630	0.3%	1,452	13.2%	2,082	1.0%

Source: PNGL

The graph to the right represents the total number of switches completed on a monthly basis, split by the domestic and I&C markets. The graph shows that the overall level of switching peaked in both sectors in Q2 2017, with a downward trajectory for the remaining year.



5 Gas in the Ten Towns area

5.1 Connections and consumption in the Ten Towns area

The table below shows gas connection numbers in the Ten Towns area at the end of 2017 and the consumption in this area during January to December 2017.

Table 17 Gas connections and consumption per market segment in the Ten Towns area

Connections as of end of Q4 2017
Total Consumption 2017

Market segment	Number of connections	% share of connections in sector	Consumption (MWh) ¹⁴	% share of consumption in sector
Domestic prepayment	30,634	84.9%	254,997	77.2%
Domestic credit	4,138	11.5%	75,426	22.8%
I&C < 73,200 kWh	1,328	3.7%		
Total Domestic and Small I&C¹⁵	36,100	100.0%	330,423	100%
I&C 73,200 to 732,000 kWh	952	79.8%	234,807	17.1%
I&C 732,001 to 2,196,000 kWh	153	12.8%	179,518	13.1%
I&C > 2,196,000 kWh	88	7.4%	955,517	69.8%
Medium & Large I&C¹⁶	1,193	100%	1,369,842	100.0%
Total	37,293		1,700,265	

Source: feDL

At the end of 2017, the domestic and small I&C connections represent 96.8% of the total connections and 19.4% of consumption. The remaining 3.2% are medium and large I&C connections and represent 80.6% of total consumption in this area.

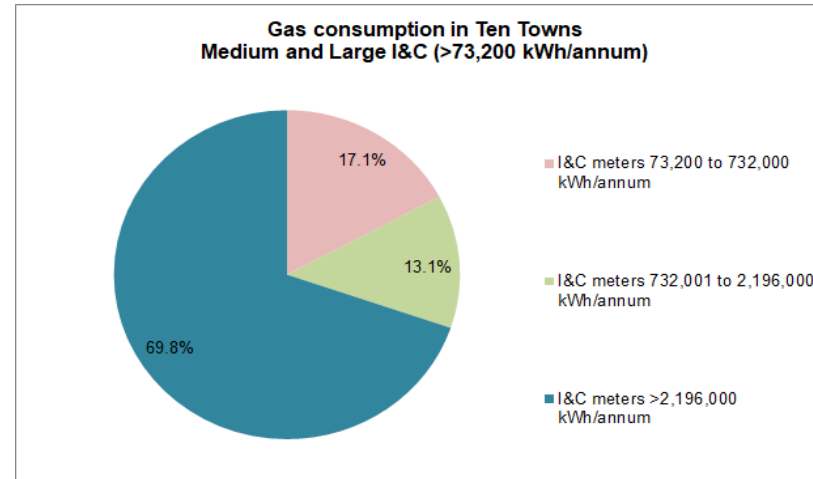
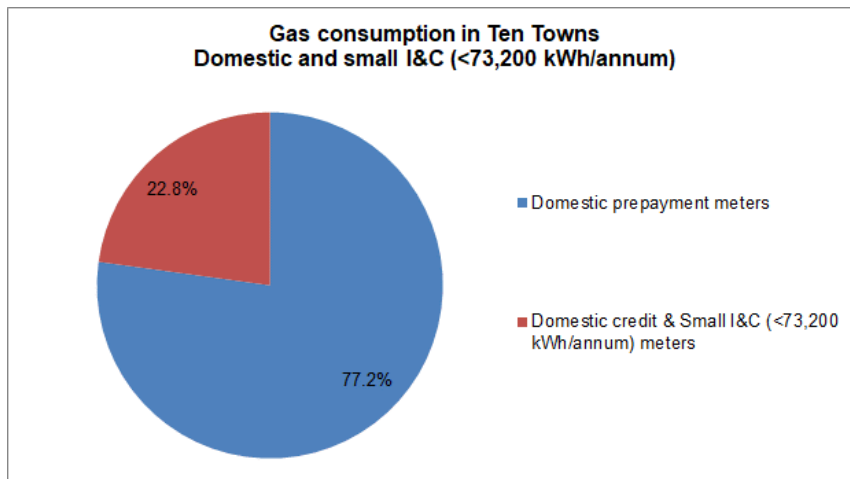
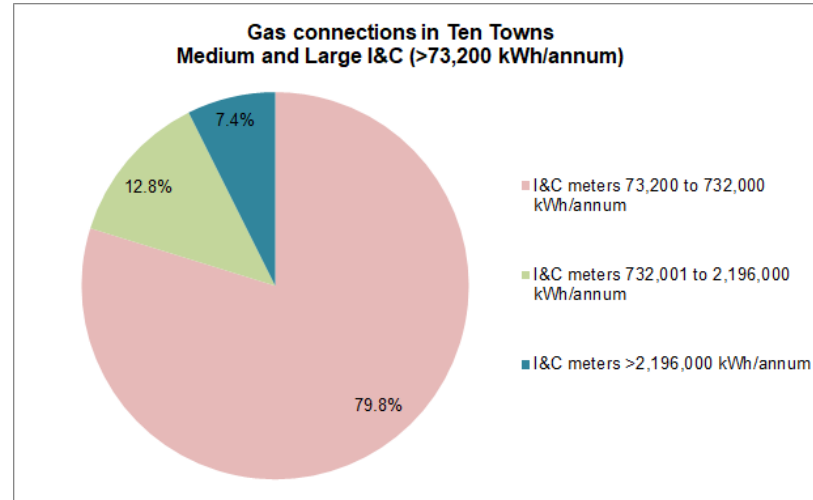
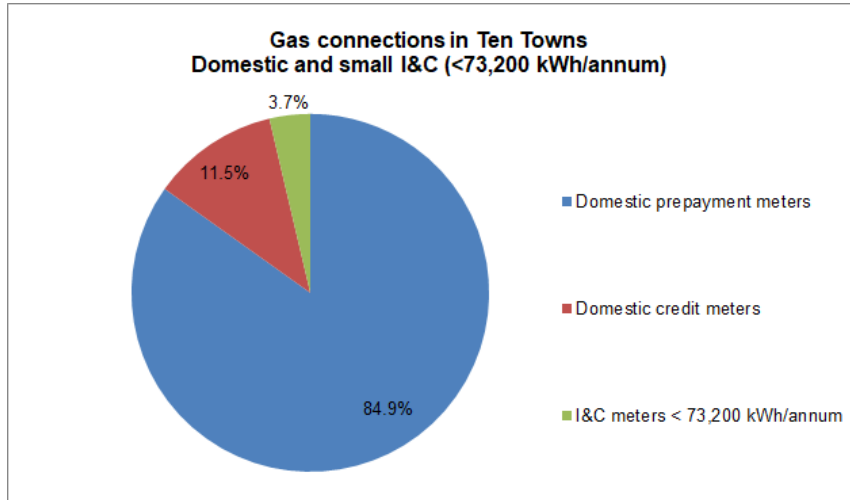
Within the domestic sector, 88.1% of the domestic connections use prepayment meters and 11.9% use credit meters to pay for their gas.

¹⁴ Gas consumption is presented in this ATR in MWh. It is important to note that gas consumption was presented in Therms in the ATRs for 2015 and previous years.

¹⁵ The domestic and small I&C sector relates to any customers using less than 73,200 kWh per annum. The consumption information for domestic credit and small I&C are combined as this information is not available to us with a full split.

¹⁶ The medium and large I&C sector relates to any customers with annual consumption that is greater than or equal to 73,200 kWh per annum.

The charts below show the numbers of gas connections in the Ten Towns area at the end of 2017 and the consumption in this area during January to December 2017.



5.2 Gas market shares in the Ten Towns area

This section provides information on the connection numbers and consumption, by supplier, in the Ten Towns area. The market shares in terms of connections are as at the end of December 2017 and the market shares in terms of consumption are for the period January to December 2017.

Competition opened in the Ten Towns large I&C market (>732,000 kWh per annum) in October 2012. The remainder of the market opened to competition in April 2015. There were four suppliers in the domestic and small I&C sector at the end of 2017, although only one supplier was active in the domestic market (the incumbent supplier). In the medium and large I&C market there were six active suppliers.

Gas shares by connections numbers

The table below shows the market shares for each supplier within the domestic and small I&C sector in the Ten Towns area.

Table 18 Domestic and small I&C¹⁷ market shares by connections

End of Q4 2017

Supplier	Domestic prepayment		Domestic credit		I&C < 73,200 kWh		Total for Domestic and Small I&C	
SSE Airtricity	0	0%	0	0%	61	4.6%	61	0.2%
firmus energy	30,634	100%	4,138	100%	880	66.3%	35,652	98.8%
Go Power	0	0%	0	0%	115	8.7%	115	0.3%
Flogas	0	0%	0	0%	272	20.5%	272	0.8%
Total	30,634	100%	4,138	100%	1,328	100%	36,100	100%

Source: feDL

firmus energy, the incumbent supplier, is the only domestic supplier in the Ten Towns area. In terms of market share by connections, firmus energy retains the majority of the small I&C market with 66.3% share at the end of 2017, which has dropped from 73.3% in 2016. The competing suppliers in the small I&C market, SSE Airtricity, Go Power and Flogas have been steadily increasing their market shares since entering the I&C market. At the end of 2017, the collective market share of these three suppliers was 33.7%.

¹⁷ The domestic and small I&C sector relates to any customers using less than 73,200 kWh per annum.

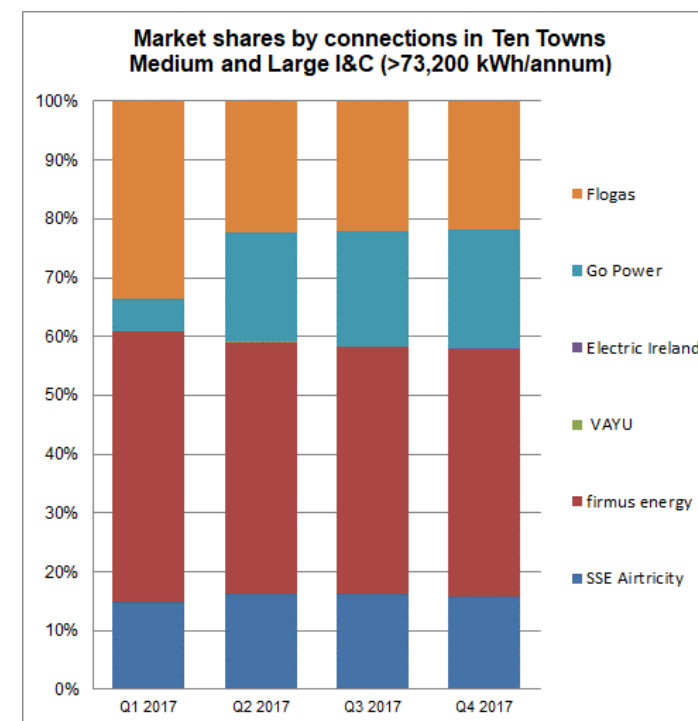
The following table shows the market shares for each supplier within the medium and large I&C sector (i.e. I&Cs with consumption over 73,200 kWh per annum) in the Ten Towns area at the end of 2017. The corresponding graph shows the change in market shares by supplier within the same sector during the year.

Table 19 Medium and large I&C¹⁸ market shares by connections

End of 2017

Supplier	I&C 73,200 to 732,000 kWh		I&C 732,001 to 2,196,000 kWh		I&C > 2,196,000 kWh		Total for Medium and Large I&C	
SSE Airtricity	133	14.0%	34	22.2%	22	25.0%	189	15.8%
firmus energy	364	38.2%	89	58.2%	47	53.4%	500	41.9%
Vayu	0	0%	0	0%	1	1.1%	1	0.1%
Go Power	211	22.2%	16	10.5%	13	14.8%	240	20.1%
Flogas	244	25.6%	14	9.2%	2	2.3%	260	21.8%
Electric Ireland	0	0%	0	0%	3	3.4%	3	0.3%
Total	952	100%	153	100%	88	100%	1,193	100%

Source: feDL



Competing suppliers are more active in the medium and large I&C market than the small I&C market in the Ten Towns area.

Overall in the medium and large sector market shares of Flogas, Go Power and SSE Airtricity were 21.8%, 20.1% and 15.8% respectively at the end of 2017. The market shares of firmus energy, the incumbent supplier, stands at 41.9%, which is a decrease from 46.9% at the end of 2016.

¹⁸ The medium and large I&C sector relates to any customers with annual consumption that is greater than or equal to 73,200 kWh per annum.

Gas shares by consumption (MWh¹⁹)

This section provides information on the consumption, by supplier, in the Ten Towns area. The market shares in terms of consumption are for the period from January to December 2017.

Table 20 Domestic and small I&C²⁰ market shares by consumption

Total Consumption 2017

Supplier	Total for Domestic and Small I&C Sector	
	(MWh)	% share
SSE Airtricity	1,587	0.5%
firmus energy	319,503	96.7%
Go Power	2,642	0.8%
Flogas	6,692	2.0%
Total	330,423	100%

Source: feDL

As firmus energy is the only supplier in the domestic market they hold the large majority of the market share by consumption in the domestic and small I&C sector.

The other competing suppliers in the small I&C section of this market (SSE Airtricity, Go Power and Flogas) have been active since Q3 2015 and are gradually increasing their market share as they take on more customers. During 2017 their combined market share in terms of consumption in the domestic and small I&C market was 3.3%.

¹⁹ Gas consumption is presented in this QTR in MWh. It is important to note that gas consumption was presented in Therms in the QTRs for 2015 and previous years.

²⁰ The domestic and small I&C sector relates to any customers using less than 73,200 kWh per annum.

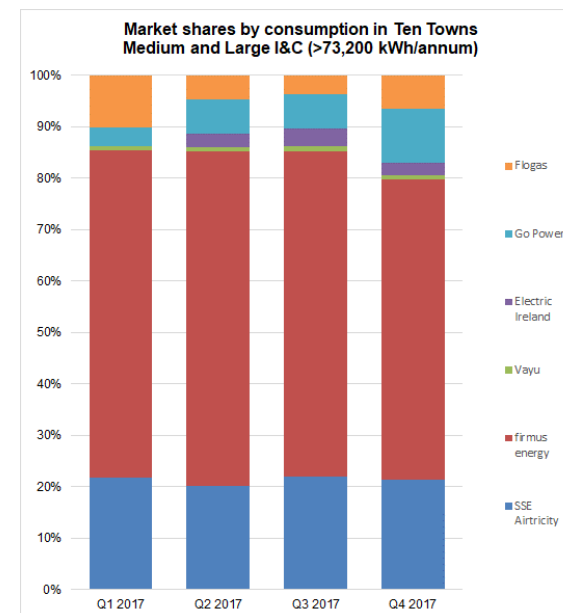
The table below shows the market shares for each supplier within the medium and large I&C sector (I&Cs using more than 73,200 kWh per annum) in the Ten Towns area during 2017.

Table 21 Medium and large I&C²¹ market shares by consumption

Total Consumption 2017

Supplier	I&C 73,200 to 732,000 kWh		I&C 732,001 to 2,196,000 kWh		I&C > 2,196,000 kWh		Total for Medium and Large I&C	
	(MWh)	% share	(MWh)	% share	(MWh)	% share	(MWh)	% share
SSE Airtricity	39,423	16.8%	41,361	23.0%	211,924	22.2%	292,708	21.4%
firmus energy	83,973	35.8%	109,247	60.9%	661,449	69.2%	854,669	62.4%
Vayu	0	0%	0	0%	11,182	1.2%	11,182	0.8%
Go Power	39,766	16.9%	13,762	7.7%	39,784	4.2%	93,312	6.8%
Flogas	71,645	30.5%	15,148	8.4%	5,279	0.6%	92,072	6.7%
Electric Ireland	0	0%	0	0%	25,899	2.7%	25,899	1.9%
Total	234,807	100%	179,518	100%	955,517	100%	1,369,842	100%

Source: feDL

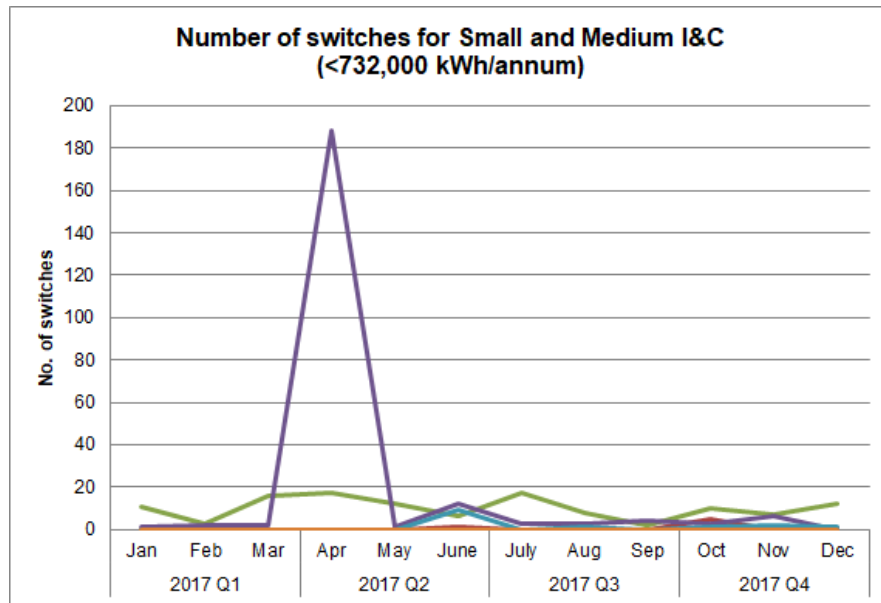


In terms of market share by consumption, firmus energy retains the largest share of the medium and large I&C sector. At the end of 2017, firmus energy has 62.4% share of this market sector. However market dynamics are changing as SSE Airtricity, Go Power and Flogas have all gained market share during the year. Electric Ireland and Vayu also entered the I&C market during 2017.

²¹ The medium and large I&C sector relates to any customers with annual consumption that is greater than or equal to 73,200 kWh per annum.

5.3 Market activity in the Ten Towns area

The line graphs below reflect the number of switching gains in the I&C market sector in the Ten Towns area. The switching gains are displayed by supplier; however the supplier names have been anonymised. There is no information is provided on domestic switching in the Ten Towns area as there are no competing suppliers in the domestic market.



These line graphs represent the split between the price-regulated and non price-regulated sectors in the Ten Towns. In both sectors there was a spike in the number of switches in April 2017 and then the switching numbers returned to lower levels.

The table to the right shows market activity through the number of switches on a quarterly basis in the Ten Towns gas market and the associated percentage switching rate. The switching rate percentages are calculated using the number of quarterly switches

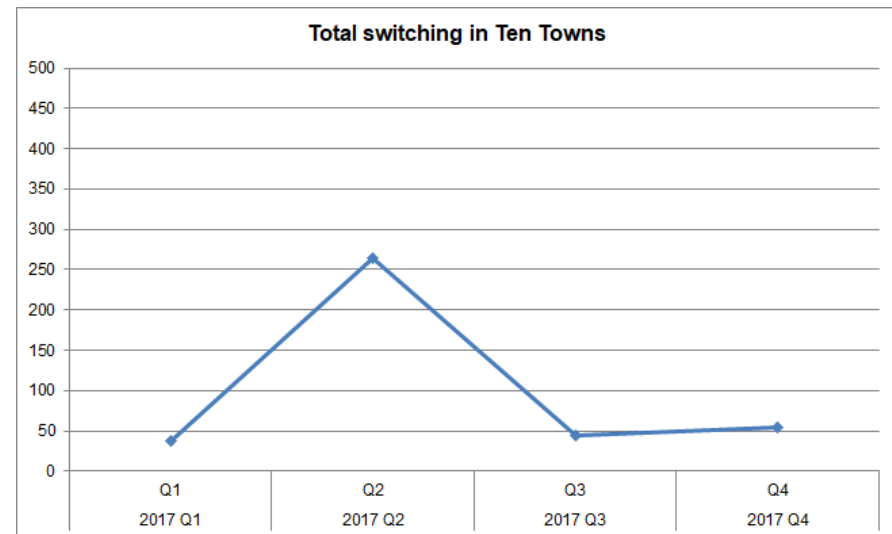
divided by the number of customers at the end of the quarter in the relevant market.

Table 22 Market activity in the Ten Towns area

Period	I&C Switching	
2017 Q1	37	1.5%
2017 Q2	265	10.9%
2017 Q3	45	1.8%
2017 Q4	55	2.2%
2017 Total	402	15.9%

Source: feDL

The overall level of switching has been consistently low in the Ten Towns however there was a substantial increase in switches within the I&C sector in April 2017 which is shown in the graph below.

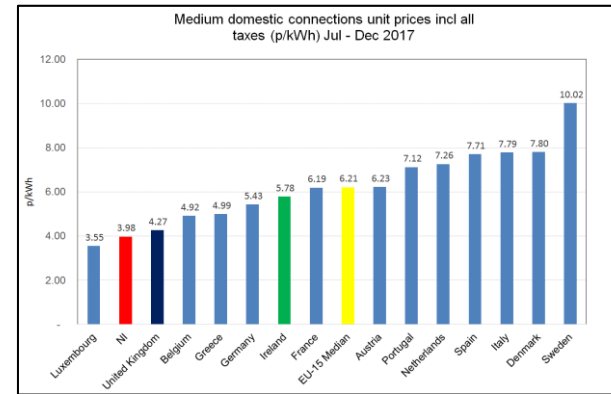


6 Gas prices in the Greater Belfast & Ten Towns areas

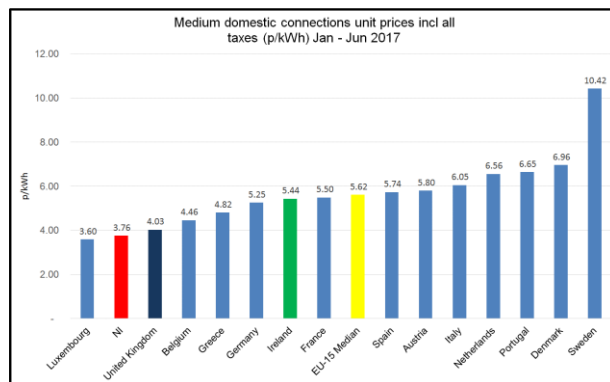
6.1 Comparison against EU prices

The gas prices section, also follows the Eurostat format and methodology (as outlined in section 3.4 electricity prices). As a result the average prices for NI are comparable with prices in other EU countries (those published in BEIS’s Quarterly Energy Prices reports²² and Eurostat data base²³) once these figures have been converted to GBP.

The pricing data detailed in this QTR is for the semester January to June 2017. In the domestic graph show below, we use unit prices which include Climate Change Levy (CCL) and include VAT, as this reflects the final prices paid by domestic customers. The medium sized domestic customers (annual consumption between 5,557 - 55,557 kWh) have been selected for the purpose of analysis, as this consumption category reflects the majority of domestic customers in NI.



Source: Eurostat and NI gas suppliers collated by UR



The NI unit price is the average pence per kWh for medium customers for the Greater Belfast and Ten Towns network areas. The NI domestic gas prices rank among the lowest in the EU. The NI gas prices is less than GB, Rol and considerably less than the EU median. It should be noted that the vast majority of NI domestic gas connections are customers of the relevant network incumbent suppliers and are therefore subject to their regulated tariffs. During the period illustrated in the graph (Semester 1: January to June 2017), price increases were announced by SSE Airtricity in the Greater Belfast area and firmus energy in the Ten Towns. The table below illustrates the changes in the regulated tariffs during the period.

²² <https://www.gov.uk/government/collections/quarterly-energy-prices>

²³ <http://ec.europa.eu/eurostat/web/energy/data/database>

1 January to 30 March 2017	Greater Belfast SSE Airtricity	Ten Towns firmus energy
Domestic Regulated Tariff Usage for first 2,000 kWh	5.061 p/kWh	5.965 p/kWh
Domestic Regulated Tariff Usage >2,000 kWh	3.468 p/kWh	4.022 p/kWh
<i>Following Regulated Tariff Reviews:</i>		
31 March to 30 December 2017	Greater Belfast SSE Airtricity	Ten Towns firmus energy
Domestic Regulated Tariff Usage for first 2,000 kWh	5.445 p/kWh	6.690 p/kWh
Domestic Regulated Tariff Usage >2,000 kWh	3.732 p/kWh	4.511 p/kWh

Glossary

ATR	Annual Transparency Report
CCL	The Climate Change Levy (CCL) is a tax on electricity, gas and solid fuels delivered to I&C consumers. Its objective is to encourage businesses to reduce their energy consumption or use energy from renewable sources. The rate changes every year.
CoS	Change of supplier
ERGEG	European Regulators' Group for Electricity and Gas
EU	European Union
Eurostat	Statistical office of the EU. Its task is to provide the EU with statistics at European level that enable comparisons between countries and regions
feDL	firmus energy (Distribution) Limited
firmus energy	firmus energy (Supply) Limited
GB	Great Britain
GBP	Great British Pound
I&C	Industrial and Commercial
kWh	Kilowatt hour. Unit of energy equivalent to one kilowatt (1kW) of power expended for one hour (1h) of time. 1,000kWh = 1MWh. 1,000MWh = 1GWh.
NI	Northern Ireland
NIEN	Northern Ireland Electricity Networks
LEU	Large Energy Users
Ofgem	Office of the Gas and Electricity Markets
PNGL	Phoenix Natural Gas Limited
Q	Quarter. In this report, Q refers to the calendar year (i.e.

	Q1 refers to the quarter January-March).
QTRs	Quarterly Transparency Reports published by the UR at the end of the second month after each calendar quarter (at the end of Feb, May, Aug and Nov).
REMM	Retail Energy Market Monitoring
RoI	Republic of Ireland
S1	Semester 1
S2	Semester 2
UR	Utility Regulator
VAT	Value Added Tax
UK	United Kingdom

Annex A: Supplier Entry to Retail Markets

The tables below set out the dates that each supplier entered the retail market sectors.

Electricity	
Domestic	Incumbent supplier: Power NI June 2010: SSE Airtricity June 2009: firmus supply June 2011: Budget Energy October 2011: Electric Ireland October 2015: Click Energy October 2015: Open Electric December 2016: Open Electric ceased supply
I&C	Incumbent supplier: Power NI July 1999: ESB Independent Energy (NI) t/a Electric Ireland August 1999: Energia January 2008: SSE Airtricity April 2009: firmus supply ²⁴ July 2011: Budget Energy February 2012: VAYU April 2012: Go Power October 2015: Click Energy

Gas: Greater Belfast Area ²⁵	
Domestic	Incumbent supplier since September 1996: SSE Airtricity ²⁶ July 2010: firmus energy
I&C	Incumbent supplier since September 1996: SSE Airtricity September 2008: firmus energy March 2009: Vayu May 2013: Electric Ireland August 2014: Go Power December 2014: Flogas

Gas: Ten Towns Area ²⁷	
Domestic	Incumbent supplier since 2005: firmus
I&C	Incumbent supplier since 2005: firmus January 2013: SSE Airtricity May 2015: Flogas June 2015: Go Power January 2017: Vayu April 2017: Electric Ireland

Gas: West Area ²⁸	
Domestic	July 2017 Designated Commissioning Supplier: SSE Airtricity
I&C	January 2017: Electric Ireland July 2017: SSE Airtricity

²⁴ Note that firmus supply left the electricity market at the end of 2015.

²⁵ The Greater Belfast area is defined in Schedule 1 of the Phoenix Natural Gas Limited conveyance licence.

²⁶ Formerly Phoenix Supply Ltd (PSL).

²⁷ The Ten Towns area is defined in Schedule 1 of the firmus energy (Distribution) Limited conveyance licence.

²⁸ The West area is defined in Schedule 1 of the Scotia Gas Networks Northern Ireland Ltd (Distribution) Limited conveyance licence.