



# Fair Trading Commission

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## Consultation Paper

### ELECTRICITY STANDARDS OF SERVICE

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*This Consultation Paper is not a legal document and does not constitute legal, commercial or technical advice. The Commission is not bound by this document. The consultation is without prejudice to the legal position of the Commission or its rights and duties to regulate the telecommunications market generally.*

## Section 1 - ELECTRICITY SERVICE STANDARDS

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### 1. BACKGROUND

#### 1.1 Fundamentals of Regulation

The issue of Standards of Service is extremely important in the regulation of utilities. In a competitive market, the consumer makes a choice of a service based on both price and quality. Competitors offering items of sub-standard quality at low prices may be forced out of the market in the same way as competitors offering reasonable standards at high prices. These natural competition forces “regulate” the market. Monopoly utilities such as Barbados Light & Power are not subject to these competitive forces, so the Commission must establish standards that are reasonable to ensure adequate service is provided to customers.

The Commission is required to regulate standards of service of utilities under the Utility Regulation Act CAP. 282. In this legislation the Commission has a mandate to ensure standards of service through the following section.

{“ 3.(1) *The functions of the Commission under this Act are in relation to service providers, to,*

*...(d) determine the standards of service applicable ...”*

Improving standards of service may increase costs to the utility, and the regulator has to make sure that these increased costs are justified by the benefits that will accrue to consumers.

In this Consultation Paper, the Commission presents Standards of Service proposed by Barbados Light & Power and invites comment from the public on these proposals. Information will also be presented on standards in place in other jurisdictions which may be applicable to Barbados.

## 1.2 Structure of Paper

This consultation paper is structured as follows:

- Part 2 sets out the framework for the Commission's proposal to establish standards
- Part 3 presents the standards proposed by Barbados Light & Power Co. Ltd and analyses them in context of its own expectations
- Part 4 addresses the issue of compensatory payments for failure to achieve standards is considered.
- Part 5 highlights power quality supply standards.
- Part 6 presents the Barbados Light & Power complaints procedure.
- Part 7 considers the requirements for monitoring and reporting are
- Part 8 provides the Commission recommendations for Codes of Practice for the Utility and ;
- Part 9 outlines the various aspects of the consultation process.

## **2. COMMISSION GUIDELINES FOR STANDARDS OF SERVICE**

### **2.1 Objectives**

The Commission is of the view that standards of service should be defined to fulfill the following overall objectives:

- Ensure reliability and quality of supply
- Safeguard safety of supply to all users

The Commission intends to achieve the objective through the following sub-objectives:

- Maximising communication with customers;
- Maximising accessibility of customers to the service;
- Minimising response time to customer service requests;
- Minimising inconvenience to customers; and
- Minimising adverse economic impacts to commercial customers

The Commission will endeavour to fulfill these objectives through the issuance of guaranteed and overall standards and the establishment of indicator indices.

### **2.2 Guaranteed Standards**

These standards are expected to be met in each individual case. The utility is required to make a compensatory payment to the customer if the standard is not met. Guaranteed standards are appropriate where the lack of achievement of the standard adversely affects an individual customer.

The Commission considers that Guaranteed Standards should be established in the following areas:

- Response time for restoring supply
- Billing punctuality
- Reconnection after payment of overdue amount
- Connection of new supply
- Making and keeping appointments
- Closure of accounts after a customer's request
- Quality of customer electricity supply (voltage, frequency, harmonics)

### **2.3 Overall Standards**

These standards are used as indicators for evaluating the general performance of the company, including overall reliability of service within each customer class. These standards have targets that are expressed in terms of percentage of the occasions that the defined standard was met. Issues appropriate for overall standards are those which relate to the performance of the company on the whole, this affects the general quality of service experienced by the broad base of customers. In such circumstances it is not appropriate to give individual guarantees.

The Commission proposes that overall service standards be established in the following areas:

- Frequency of meter readings
- Response to complaints high / low voltage
- Prior Notice of Outages
- Response to customer queries

The Commission also considers that the company should provide an indication of the response times expected for the occasions when the targets are not met.

## 2.4 Indicator Indices

In addition to monitoring the factors above, the Commission proposes to adopt the following indices as a further means of measuring overall standards. This system is employed for electric utilities in Ontario Canada by the Ontario Energy Board.

### System Average Interruption Duration Index (SAIDI)

This factor is a measure of the average number of hours per year that a customer is without electricity service. It is a measure of the overall reliability of the service for the customer

$$\text{SAIDI} = \frac{\text{Total Customer Hours Interruptions}}{\text{Total Number of customers Served}}$$

### System Average Interruption Frequency Index (SAIFI)

This is an indicator of the frequency of interruptions per year.

$$\text{SAIFI} = \frac{\text{Total Customer Interruptions}}{\text{Total Number of customers Served}}$$

### Customer Average Interruption Duration Index (CAIDI)

This is a measure of how quickly power is restored after an outage. This relates directly to the response time of the company.

$$\begin{aligned} \text{CAIDI} &= \frac{\text{SAIDI}}{\text{SAIFI}} \\ &= \frac{\text{Total Customer Hours of Interruption}}{\text{Total Number of Customer Interruptions}} \end{aligned}$$

These indices are useful indicators of the reliability and efficiency of electricity production and distribution and are relatively simple to calculate. Currently the Commission receives monthly outage statistics for the company which includes details of areas where outages occurred and the duration of each outage.

By collecting and comparing the measurements on a monthly basis, the Commission will be able to determine whether there has been an improvement or a deterioration in the standard of production and distribution of electricity in Barbados.

- Q1. What is your view on the service areas in which the Commission wishes to adopt guaranteed and overall standards? Are there any other areas where standards should be established?**
- Q2. Do you agree with the use of the indices indicated in evaluating the performance of Barbados Light & Power Co. Ltd? Are there other indices that could be used?**



### 3. STANDARDS OF SERVICE PROPOSED BY THE BARBADOS LIGHT & POWER CO. LTD

The Public Utilities Board (PUB), predecessor to the Fair Trading Commission, invited Barbados Light & Power Company Ltd to design and implement voluntary standards of service. The Commission is also seeking to encourage the adoption of voluntary standards in addition to those that it believes must be prescribed.

The company has indicated that it has begun to monitor nine service standards which are described and explained below.

**Table 1: Standards Proposed by Barbados Light & Power**

Description	Required Performance	Percentage of Activities meeting Standard in 2003
Restore supply due to fault on customer's service ( single customer)	16 hours	100%
Restore supply after fault on distribution system ( multiple customers)	16 hours	100%
Advanced notice to customers of planned supply interruption	3 days	1 customer not notified
Investigation of voltage complaints	Visit within 3 working days, correct within 6 months	100%
Provide a simple service connection ( connection point within 30 m)	12 working days	97.5%
Provide cost estimate for complex connection requiring a service visit	60 working days	100%
Reconnect or transfer of an existing service	2 working days	94.7%
Respond to queries about electricity account	15 working days	70.3%
Keeping appointments	On time	100%

**Q3. What are your general comments on the Customer Service Standards presented by the company?**

**Q4. What are your comments on the targets proposed by the company?**

### **3.1 Comparison with other jurisdictions**

The Commission considers that it is beneficial for the Barbados Light & Power to compare its performance with practices adopted in other countries, to ensure that it continues to aim for the highest standards of excellence. This is a form of benchmarking and the Commission appreciates that variations in standards can occur due to differences in structure of the economy, population densities, distances of residences from the electricity grid, growth in demand for electricity and the type of regulation.

Below is a comparison of the standards recommended by Barbados Light & Power with those in place in other jurisdictions.

**Table 2: Guaranteed Standards from Selected Countries**

<b>Service Description</b>	<b>Barbados (BL&amp;P proposed)</b>	<b>Jamaica<sup>1</sup></b>	<b>Trinidad &amp; Tobago<sup>2</sup></b>	<b>Hong Kong <sup>3</sup></b>	<b>United<sup>4</sup> Kingdom</b>
<b>Response to Service calls after forced outages</b>	<b>16 hours</b>	6 hours	8 hours	2 hours	18 hours
<b>Connection of supply within 30 metres</b>	<b>12 working days</b>	4 working days	3 working days	Next Day	30 working days
<b>Connection of supply 30 to 250 metres</b>	<b>None</b>	10-30 Working days	5-20 working days	None	30 working days
<b>Billing punctuality.</b>	<b>None</b>	30	65	None	30

<sup>1</sup> Office of Utility Regulation, Annual Report 1997 provided by, Standards determined for 1998-1999.

<sup>2</sup> Quality of Service Standards for the Trinidad & Tobago Electricity Commission , September 2002

<sup>3</sup> Hong Kong Electric Company Ltd , Customer Service, Service Standards, [http://www.hec.com.hk/hec/customer/service\\_3.htm](http://www.hec.com.hk/hec/customer/service_3.htm)

<sup>4</sup> Reference Office of Gas & Energy Markets OFGEM, *Competitive Energy Markets, Standards of service*, [http://www.dti.gov.uk/energy/inform/energy\\_indicators/ind08.pdf](http://www.dti.gov.uk/energy/inform/energy_indicators/ind08.pdf)

<b>Time for first bill to be mailed after connection</b>		working days	working days		working days
<b>Reconnection after payment of overdue amounts</b>	None	2 Working days	24 hours	Same day	Same day
<b>Response to emergencies</b>	None	6 hours	N/A	21 minutes	3 hours
<b>Notice of Supply interruption</b>	None	None	3 days notice	7 days notice	5 days notice

As the table indicates, Barbados Light & Power have not proposed standards in the following areas:

- Billing punctuality
- Time for first bill to be mailed after connection
- Reconnection after payment of overdue amounts
- Response to emergencies

**The Commission considers there should be guaranteed standards for these aspects as well as the areas identified by BL&P.**

**The Commission is also of the view that consideration should be given to reducing the service calls response time and connection of service supply within 30 metres to bring the target more in line with those adopted in the other Caribbean jurisdictions mentioned.**

#### **4. POWER QUALITY SUPPLY STANDARD**

Barbados Light & Power Co. Ltd has adopted standards with respect to standards for power quality. The company has adopted the standard generally used in the USA which is an acceptable tolerance level of + or - 10Volts. This standard is considered critical by the Commission in light of complaints from consumers in relation to damage from over voltage conditions. This standard is important in

ensuring safety of persons using electrical equipment as well as the protection of the equipment itself.

In the table below the acceptable voltage standard recommended by Barbados Light & Power are compared to some other international jurisdictions<sup>5</sup>.

**Table 4: Voltage Tolerances from Selected Countries**

Country	Allowed voltage tolerance	
Australia	- 10%	+ 10%
<b>Barbados</b>	<b>- 10%</b>	<b>+ 10%</b>
Trinidad & Tobago	- 6%	+6%
United Kingdom	-6%	+10 %

The Commission is satisfied that a tolerance level of + or - 10Volts is an acceptable standard to be established for BL&P.

### Question

Do you think that the voltage tolerance considered acceptable by Barbados Light & Power Co. Ltd is reasonable? Give reasons.

## 5. COMPENSATORY PAYMENTS

### 5.1 Compensation for Breach of Guaranteed Standards

Section 38 of the Utilities Regulation Act gives the Commission the authority to impose penalties in the event of non compliance with prescribed standards. The

<sup>5</sup> Energy Australia, *Electrical Supply Standards*, [www.energy.com.au](http://www.energy.com.au) Australia , Trinidad & Tobago, T&TEC, *Electricity Supply Rules, Section 15* , *Electricity Inspection Act* , Chapter 54:72, [www.ttec.co.tt](http://www.ttec.co.tt), [www.powernetworks.co.uk](http://www.powernetworks.co.uk) , United Kingdom

Commission may also order that compensation be paid to affected individuals for failure to meet these standards.

In setting targets for the utility company, the issue of determining compensatory payments in the event that guaranteed standards are not met is critical to the overall effectiveness of the system. The schedule for the phasing in of these payments needs to be determined. If penalties are put in place too early the utility may consider the system as too draconian and compliance may not be achieved. The level of the fine must be set at a level which will not be overly advantageous to compensated customers or unduly jeopardise the company's viability.

The Commission proposes to implement a minimum of \$10.00 per customer refund for each breach of domestic standards, \$50.00 for each breach of commercial standards. The Commission will also consider establishing a system where the level of the fine can be altered depending on the extent to which the standard is breached. It is anticipated that the magnitude of these penalties will be reviewed periodically. These payments were set at a level comparable to Jamaica which has a system of compensatory payments already in place. The difference in payments between residential and domestic is due to the fact that customers who stand to lose their economic livelihood through lack of electricity are considered to be more disadvantaged than residential customers.

Compensatory payments in all cases are proposed to be administered through a credit on the customer's next bill. Alternatively compensation level could be calculated based on 20% of monthly bill paid by the residential customer or 10% of monthly bill paid by commercial customers, which was used as the basis for compensation in the Jamaica scenario which is discussed below.

The Jamaica Public Service Company is obliged to pay domestic account holders (\$2.50 US) dollars which is about 20 % of average monthly revenue and commercial account holders (\$12.50 US) which is about 10% of average monthly revenue dollars for each breach of guaranteed standards. However, the payments are not automatic.

Consumers must make a claim for each breach. The guaranteed standards were negotiated between the Office of Utilities Regulation and the utility company. The cost of electricity in Jamaica is approximately 14 US cents per KWh, compared to an average of 15 US cents per KWh in Barbados.

## **5.2 Penalties for breach of Overall Standards**

Office of Gas and Electricity Markets (OFGEM) which regulates the electricity and gas sectors in the United Kingdom may fine the electricity distribution companies up to 10 % of the revenue in a month, if they determine that the company has not ensured security of supply to customers. The Commission will consider imposing a similar penalty on the company. This will be established once targets for overall standards are developed.

- Q5. What is your view on establishing an obligation on the company to pay customers if guaranteed standards are not achieved?**
- Q6. Do you support a fine being imposed on the company for not achieving standards? What are your views on the level of compensation to customers proposed by the Commission for failing to achieve guaranteed standards?**
- Q7. What is your view on the Commission's proposal to require that the company make compensatory payments to customers for not achieving standards?**
- Q8. Should the system of compensatory payments be phased in ? Do you have any proposals with respect to this?**

### **4.1 Compensation for Damaged equipment**

The Commission is also concerned about compensation for damage to equipment due to over voltage. Considering that power quality is proposed for inclusion as a guaranteed standard the Commission suggests that the company compensates customers the cost of repair or replacement as a result of unacceptable power quality. The company already has an internal policy which it uses to settle damage claims but this policy does not include compensation for lack of fulfilling guaranteed service standards described previously. The policy used by the company is summarized below.

Settlements are offered in the following situations:

- Errors made by company employees;
- Failure of neutral connection before the service point;
- High voltage at transformer terminals producing unacceptable voltage levels;
- Short circuits on secondary distribution up to service point;
- Tree limbs breaking the neutral Low Tension (LT) lines, except when the tree is on customer's property breaking his/ her service wire.

The Company does not offer settlement in the following situations:

- Outages or other events arising from lightning strikes, wind or other Acts of God
- Damage resulting from the action of third parties
- Loose, broken or corroded neutral connections in the meter socket base.
- Rainstorms and other acts of God.
- Inadequacies or faults on customer side of the electrical installation

**Q9. What are your comments on the criteria provided by Barbados Light & Power, for compensation of equipment damaged due to electrical supply? How should the level of compensation be determined?**

**Q10. Do you agree that BL&P should formalize their policy in respect to compensation for damage claims and make them public? Give reasons.**

## 6. COMMISSION PROPOSED STANDARDS OF SERVICE

The Commission proposes that the following guaranteed standards relating to supply, metering and customer service be adopted. These standards would require that compensatory payments be paid to the customers if the standard is not reached.

**Table 3: Proposed Guaranteed Service Standards and Compensatory Payments**

Description	Target	Compensatory Payments
Restore supply due to fault on customer's service (single customer)	16 hours	\$10.00 residential \$50.00 commercial
Restore supply after fault on distribution system (multiple customers)	16 hours	\$10.00 residential \$50.00 commercial
Advanced notice to customers of planned supply interruption	3 days	\$10.00 residential \$50.00 commercial
Investigation of voltage complaints	Visit within 3 working days, correct within 6 months	\$10.00 residential \$50.00 commercial
Provide a simple service connection (connection point within 30 m)	12 working days	\$10.00 residential \$50.00 commercial
Provide cost estimate for complex connection requiring a service visit	60 working days	\$10.00 residential \$50.00 commercial
Reconnect or transfer of an existing service	2 working days	\$10.00 residential \$50.00 commercial
Respond to queries about electricity account	15 working days	Overall standard, no compensatory payment
Keeping appointments	On time	100%



**Table 4****Proposed Overall Service Standards**

<b>Description</b>	<b>Target</b>	<b>%</b>
<b>Frequency of meter reading</b>	<b>Every two months</b>	<b>90%</b>
<b>Response to Complaint high/low voltage</b>	<b>5 working days</b>	<b>95%</b>
<b>Prior notice of outages</b>	<b>48 hours</b>	<b>95%</b>
<b>Response to Customer Queries</b>	<b>5 working days</b>	<b>95%</b>
<b>Proposed Indicator Indices</b>	<b>CAIDI, SAIFI, SAID</b>	
<b>Proposed Power Quality Standard</b>	<b>+ or - 10 volts tolerance</b>	<b>100%</b>

**7. CUSTOMER COMPLAINTS PROCEDURE**

One of the principal issues related to consumer satisfaction is the issue of the procedure for complaints handling. Barbados Light & Power uses the following procedures.

Billing and Other Query Requests - Having received the query and analysed the information the Company may issue a service order to address the request.

**Damage Claims**

On receipt of a complaint the company may issue a service order to a Power Quality Engineer. The Company visited the customer premises and carries out relevant test. After an analysis of all of the information the Company makes a determination and advises the customer. Where the claim is accepted by the Company a compensatory payment is made. Where required, further corrective action may be taken

### **Low Voltage**

After receipt of the complaint, the Company visits the customers premises and corrective action taken, where appropriate. If required a work order is generated for Power Quality section to investigate further following which corrective action is taken

### **Trouble Calls**

After receipt of the complaint, the Company visits the customers' premises corrective action taken, where appropriate Complaint received. Where corrective action requires other resources, a work order is generated and passed to the appropriate section for action

The Commission considers that the process outlined should be made public and form part of a Code of Practice. The characteristics of this code of practice are addressed in the following section.

**Q12. What is your view on the complaints handling procedure submitted by Barbados Light & Power Co. Ltd? Do you consider that these procedures should be included in a code of practice?**

## **8. CODES OF PRACTICE**

The Commission considers that a Code of Practice should be established in order to ensure that the general public is aware of the responsibilities of the company as well

as the guaranteed standards. The Commission proposes that this code set out specifically the responsibility of the company to the customer.

A Code of Practice is a set of principles, targets and promises given by a service provider or providers operating in a particular market. The development of codes is designed to remove all ambiguity regarding the roles and responsibilities of consumer and service provider. Codes are not always legally binding but provide a clear framework for the conduct governing the industry in question. They are designed to encourage businesses to aim for standards of service which go beyond those required by law.

The Commission is of the view that the code developed should be made available free of charge to all consumers. The Commission is also of the view that the code of practice developed by Barbados Light & Power should address the following:

- Billing cycles
- Bill Payment options (locations, methods of payment, etc.)
- Power quality guarantees
- List of guaranteed standards
- Guidelines for compensatory payments
- Complaints procedure

**Q15. What is your view on the proposal to require Barbados Light & Power to develop a Code of Practice?**

**Q16. Do you agree with the areas which the Commission suggests should be addressed in a code? Are there any other areas in which a Code of Practice could be applied?**

## 9. REPORTING AND MONITORING

In order to establish whether standards of service are maintained it is important that mechanisms are in place to ensure that the reporting requirements are met. The company has put steps in place to develop targets and indicators. There is however no requirement by the company to provide any documentation of these standards of service results to the Commission.

In determining the effectiveness of any programme implemented it is important that the relevant indicators used to gauge compliance with standards are transparent. The Commission proposes that the company presents the supporting documents that they used to establish whether or not targets were met. This aspect will also be important with regards to determining compensatory payments. The Commission is also of the view that this information should be made available to the general public.

The Commission also recognises that in order to ensure transparency, an independent agency will need to be involved to ensure that standards reported are verifiable. This is especially crucial in disputes that may occur between customers and the utility. A Government agency such as Barbados National Standards Institute (BNSI) or Government Electrical Engineering Division (GEED) could be involved in this process. This would include hiring an independent technician to verify power quality complaints. The cost of this would be shared between the company and consumers.

The reporting and monitoring system should be continually evaluated with a view to improving the overall system. Aspects such as environmental quality and social welfare may well be added in the future as the requirements for ensuring continuous improvement are reviewed.

- Q13. Do you agree that the company should make available to the public, upon request, full details of statistics used in determine overall standards? Or do you consider that this information should only be provided to the Commission?**
- Q14. What are your views on the proposal to hire an independent technician to investigate power quality complaints? How do you think such a programme should be financed?**

## SECTION 2 – CONSULTATION PROCESS

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### 10. CONSULTATION PROCESS

#### 10.1 Background

The Fair Trading Commission (“the Commission”) established by the Fair Trading Commission Act, CAP 326B, is the independent regulator of international and domestic telecommunications services and electricity services.

In carrying out its duties as an independent regulator, the Commission must operate in a transparent, accountable and non-discriminatory manner. Consultative documents and the public consultation process are the main ways in which the Commission discharges its responsibilities relating to transparency and accountability.

In addition, the Commission is specifically charged under the Fair Trading Commission Act CAP 326B to consult with interested persons when it is discharging certain functions.

Section 4(4) of the *Fair Trading Commission Act, CAP. 326B* states:

*“The Commission shall, in performing its functions under subsection (3)(a), (b), (d) and (f)<sup>6</sup>, consult with the service providers, representatives of consumer interest groups and other parties that have an interest in the matter before it.”*

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<sup>6</sup> Section 4(3) of the Act states:

*The Commission shall, in the performance of its functions and in pursuance of the objectives set out in subsections (1) and (2):*

- (a) establish the principles for arriving at the rates to be charged by service providers;*
- (b) set the maximum rates to be charged by service providers; . . .*
- (d) determine the standards of service applicable to service providers; . . .*
- (f) carry out periodic review of the rates and principles for setting rates and standards of service of service providers.*

## 10.2 Consultative Documents

On important issues that arise in the regulation of the utility industries, the Commission may issue a consultative document, a public discussion paper, in which the Commission:

- (a) brings to public attention important issues relating to utility regulation to promote public understanding and debate;
- (b) puts forward options and/or proposals as to the approach to adopt in dealing with these issues, to seek to resolve them in the best interests of the consumer, the service provider and the society at large; and
- (c) invites comments from interested parties, such as consumers, service providers, businesses, professionals and academics.

The issues at hand will influence the nature of the document and its content. On some issues, the Commission may simply set out what it regards as the available options and, although there would be some analysis of the pros and cons of the options, it might be that no one option emerges as the favoured or proposed approach. On other issues, the Commission might set out a clear preference for a particular approach and invite comments on this basis.

The views and analysis set out by the Commission in a consultative document are intended to invite comments which may cause the Commission to revise its views.

The consultative document generally includes a series of specific questions on which the Commission is particularly seeking comments. To ease the task of analysing comments, respondents should reference the relevant question numbers in the document. If they consider it appropriate, respondents may wish to address other aspects of the document for which the Commission has not prepared specific questions. Failure to provide answers to all questions will in no way reduce the

consideration given to the entire response. Commercially sensitive material should be clearly marked as such and included in an annex to the response.

### **10.3 Responding to this Consultation Paper**

The Commission invites and encourages written responses in the form of views or comments on the matters discussed in the Paper from all interested parties including Barbados Light and Power Co. Ltd., other regulated or soon to be regulated utilities, other licensed operators, government ministries, non-governmental organisations (NGO'S), consumer representatives, residential consumers, business of all sizes and their representatives, the academic community and all other stakeholders.

### **10.4 Standards of Service Consultation Programme**

The Electricity Standards of Service consultation process includes a residential standards of service survey which was administered during the month of May, 2004 at the BMEX exhibition, a report of this survey is available at the Commission. This survey allowed customers to respond to a number of general questions related to service.

The results of this survey will be considered together with the responses to this consultation paper. The Commission will issue a determination on the service standards which will be made available to the public.

The Consultation period will begin on **September 13, 2004** and end on **November 29, 2004 at 4.00 p.m.** All written submissions should be submitted by this deadline. The Commission is under no obligation to consider comments received after 4:00 p.m. on November 29, 2004.

Copies of this Consultation Paper can be collected between the hours of 9.00 a.m. to 4.00p.m, Mondays to Fridays during the consultation period from the Commission's offices at the following address:



Fair Trading Commission  
Manor Lodge  
Lodge Hill  
St. Michael  
BARBADOS

The Consultation Paper can also be downloaded from the Commission's website at <http://www.ftc.gov.bb>

Respondents to the Consultation may submit responses in electronic format. The Commission would prefer that email responses be prepared as word documents, attached to email cover letter and forwarded to: [info@ftc.gov.bb](mailto:info@ftc.gov.bb)

Responses can be faxed to the Commission using fax number (246) 424-0300.

Mailed or hand delivered responses should be addressed to the Commission Secretary at the above mailing address.

### **Confidentiality**

The Commission is of the view that this consultation is largely of a general nature. The Commission expects to receive views from a wide cross section of stakeholders and believes that views and comments received should be shared as far as possible with all respondents.

Respondents should therefore ensure that they indicate clearly to the Commission any response or part of a response that they consider to contain confidential or proprietary information.

### **9.5 Analysis of Responses**

The Commission expects, in most consultations, to receive a range of conflicting views. In such circumstances, it would be impossible for the Commission to agree with all respondents. Through its documents the Commission will seek to explain the basis for its judgments and where it deems appropriate give the reasons why it

agrees with certain opinions and disagrees with others. Sometimes analysis of new evidence presented to the Commission will cause it to modify its view. In the interests of transparency and accountability, the reasons for such modifications will be set out and, where the Commission disagrees with major responses or points that were commonly made, it will in most circumstances, explain why.

## **9.6 List of questions**

- Q1. What is your view on the service areas in which the Commission wishes to adopt guaranteed and overall standards? Are there any other areas where standards should be established?**
- Q2. Do you agree with the use of the indices indicated in evaluating the performance of Barbados Light & Power Co. Ltd? Are there other indices that could be used?**
- Q3. What are your general comments on the Customer Service Standards presented by the company?**
- Q4. What are your comments on the targets proposed by the company?**
- Q5. What is your view on establishing a policy of obligation to pay customers if guaranteed standards are not achieved?**
- Q6. Do you support a fine for the companies for not achieving standards? What are your views on the options for level of compensation to customers proposed by the Commission for failing to achieve guaranteed standards?**
- Q7. What is your view on implementing penalties to the company for not achieving overall standards?**
- Q8. How should the system of penalties be phased in ?**

- Q9. What are your comments on the criteria provided by Barbados Light & Power, for compensation of equipment damaged due to electrical supply? How should the level of compensation be determined?**
- Q10. Do you agree that BL&P should formalize their policy in respect to compensation for damage claims and make them public? Give reasons.**
- Q11. What is your opinion on method through which compensation is given?**
- Q12. Do you agree that the company should make available to the public, upon request, full details of statistics used in determine overall standards? Or do you consider that this information should only be provided to the Commission?**
- Q13. What are your views on the proposal to hire an independent technician to investigate power quality complaints? How do you think such a programme should be financed?**
- Q14. What is your view on the complaints handling procedure submitted by Barbados Light & Power Co. Ltd? Do you consider that these procedures should be included in a Code of Practice?**
- Q15. What is your view on the proposal to require Barbados Light & Power to develop a Code of Practice?**
- Q16. Do you agree with the areas which the Commission suggests should be addressed in a code? Are there any other areas in which a code of practice could be applied?**

