



FAIR TRADING COMMISSION

CONSULTATION PAPER

DETERMINATION OF STANDARDS OF SERVICE FOR THE BARBADOS LIGHT & POWER COMPANY LIMITED (BL&P)

(Review of Performance: April 2018 - December 2020)

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Document Number: FTC/UR/CONSOSBLP/2021-01

DOCUMENT TITLE: Review of The Barbados Light & Power Company (BL&P) Standards of Service April 2018 - December 2020

ANTECEDENT DOCUMENTS

Document Number	Description	Date
FTC/UR/CONSOSBL&P 2017 - 01	Review of Barbados Light & Power Company Limited Standards of Service	April 03, 2017
FTC/UR/2014-01	Decision on BL&P Standards of Service 2014 - 2017	May 09, 2014
FTC/URD/CONS 2013-01	Consultation Paper - Review of the BL&P Standards of Service	October 25, 2013
FTC/UR/2010-03	Decision on BL&P Standards of Service 2010- 2013	February 22, 2010
FTC/CONS 2008-02	Consultation Paper - Review of the BL&P Standards of Service	October 29, 2008
FTC/UR/2006-2	Decision on BL&P Standards of Service 2006 - 2009	February 28, 2006

THE CONSULTATION PROCESS

When determining Standards of Service, the Commission is required to consult with service providers, consumer interest groups and other persons with an interest in the Standards of Service, pursuant to section 4(4) of the Fair Trading Commission Act (FTCA). In addition, the Commission considers that public participation is a key component to its decision-making process and therefore invites submissions from interested parties concerning its review.

PURPOSE OF CONSULTATION PAPER

This consultation document outlines the Commission's process for the determination of Standards of Service for the Barbados Light & Power Company Limited (the BL&P), pursuant to section 4 (3) of the FTCA, CAP. 326B and sections 3 and 4 of the Utilities Regulation Act CAP. 282 (URA) of the Laws of Barbados.

Included herein is a series of specific questions for which the Fair Trading Commission (the Commission) is 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 consultation paper for which the Commission has not prepared specific questions. There is no obligation to respond to all of the 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.

This consultation document is intended to solicit comments relating to:

- (a) The appraisal of the BL&P's Guaranteed and Overall Standards of Service performance;

- (b) The adequacy of these Standards of Service;
- (c) The amendment of the existing Standards of Service;
- (d) The adjustment of the reliability targets associated with the current reliability indices; and
- (e) The amendment of the modes (*automatic vs manual*) and values of compensation assigned for a breach of the Standards of Service.

Submissions need not be confined to the questions posed, but may relate to any matter raised in the document. The consultation document may be accessed via the Commission's website, <http://www.ftc.gov.bb>.

STRUCTURE OF CONSULTATION PAPER

This paper consists of eight (8) sections:

- Section 1 provides an update on the electricity sector.
- Section 2 presents the legal framework and functions of the Commission relating to the Standards of Service.
- Section 3 examines the definitions and specific exemptions for each Standard of Service.
- Section 4 offers a review and evaluation of the BL&P's performance for the period April 2018 – December 2020.
- Section 5 lists proposed amendments to the existing Standards of Service.
- Section 6 lists Force Majeure and other General Exemption conditions.
- Section 7 details the role of the Commission with regards to the monitoring and enforcement of Standards of Service.
- Section 8 presents the list of consultation questions.

RESPONDING TO THE CONSULTATION PAPER

The Commission invites and encourages written responses, in the form of views or comments on the matters discussed in the Consultation Paper, from all interested parties including the BL&P, other regulated or soon to be regulated utilities, other licensed operators, government ministries, non-governmental organisations, customer representatives, residential customers, businesses and academics.

The consultation period will begin on **May 25 2021** and end on **June 22, 2021** 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 **4:00p.m** on **June 22, 2021**.

The Consultation Paper may be downloaded from the Commission's website at <http://www.ftc.gov.bb>. Copies of the Consultation Paper may also be collected between the hours of 9:00 a.m. to 4:00 p.m., Monday to Friday, during the consultation period, from the Commission's offices at the following address:

Fair Trading Commission
Good Hope
Green Hill
St. Michael
BARBADOS

Responses to the Consultation Paper may be submitted in electronic format. The Commission would prefer that emailed responses be prepared as Word documents, attached to an email cover letter and forwarded to: info@ftc.gov.bb.

Responses may also be faxed to the Commission at (246) 424-0300. Mailed or hand delivered responses should be addressed to the Chief Executive Officer – Mrs Sandra Sealy.

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 widely 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.

ANALYSIS OF RESPONSES

The Commission expects, as in most consultations, to receive a range of views. Due consideration will be given to all comments received as part of the consultation process. Through its decision, 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 interest 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, provide an explanation thereto.

SECTION 1 - BACKGROUND

1.1 INTRODUCTION

Market competition plays a vital role in the delivery of service quality which in turn influences consumer preference. The competitor who succeeds in offering a price and quality of product that the consumer is willing to pay and accept can dominate the market. In the absence of competition, the behaviour of monopolies is constrained by regulatory institutions like the Commission. As monopolies are not subject to market competition, they may be inclined to trade price for quality of service (QoS). The Commission is therefore obligated to ensure that a minimum accepted level of service exists for regulated services, thus the establishment of Standards of Service.

The BL&P is a vertically integrated company, that is, it generates, transmits and distributes electricity for its consumer base of 130,858 customers¹. The BL&P provides electricity to Domestic Service (D), General Service (GS), Secondary Voltage Power (SVP) and Large Power (LP) customer classes; there is also a class for employees. The utility has a gross generating capacity of 278 MW, of which 96.4% is produced from fossil fuel²; However, against the background of the ambitious targets of the Barbados National Energy Policy (BNEP) which aims for 100% renewable energy (RE) and a carbon neutral island state by 2030³, fossil-fuel dominant electricity generation will soon be replaced with renewable sources, primarily Wind & Solar Photovoltaic (PV).

1.2 STATUS OF DOMESTIC ELECTRICITY SECTOR

¹ Emera Caribbean, “*Barbados Light & Power Company Limited*,” accessed February 22, 2021, <https://www.emeracaribbean.com/our-affiliates/blpc>.

² The Barbados Light & Power Company Limited, “*How We Generate Electricity*,” accessed February 24, 2021, <https://www.blpc.com.bb/index.php/company/how-we-serve-you/how-we-generate-electricity>.

³ Ministry of Energy & Water Resources, Barbados, “*Barbados National Energy Policy 2019 – 2030*,” accessed February 24, 2021, <https://www.energy.gov.bb/web/national-energy-policy-for-barbados-2019-2030>.

Against the background of BNEP 2019 – 2030, movement has been detected in terms of achieving the 100% RE and carbon neutrality target set. In August 2016, the BL&P commissioned its 10MW alternating current (AC) PV Solar Plant in Trents, St. Lucy⁴. This PV Solar plant also contains a two (2) battery 5MW/20MWh Tesla Powerpack energy storage system to store excess solar energy. The plant represents the first of the BL&P's RE projects as outlined in its 2013 Integrated Resource Plan (IRP). Similarly, the details for the construction of a second RE project in the form of a 10 MW Wind Farm in Lamberts, St. Lucy,⁵ are currently being finalised.

Similarly, the BL&P's Clean Energy Bridge (CEB) is a 33 MW Medium Speed Diesel Plant that is expected to be commissioned during the first half of 2021⁶. The CEB is intended to allow the BL&P to secure reliable base load generation while the transition is made from the current generation mix, to a cleaner solution. The CEB is expected to remain as a backup, for grid resilience and reliability beyond the achievement of the BNEP targets. The BL&P further describes the CEB as a 'stop gap' between old and new generation units, which is forecasted to be more efficient than those being replaced. BL&P has asserted that through its implementation, immediate fuel savings are expected to be enjoyed and passed on to the customer. This newer more reliable plant is also expected to improve the reliability of service provided to customers⁷.

During the 2018 - 2020 period, the electricity sector took even further steps towards sector-wide reform, positioning itself appropriately, for the transformation to RE technologies. Primarily through the Feed-In-Tariff (FIT) programmes, the framework continues to be laid for the achievement of the ambitious 2030 targets.

⁴ The Barbados Light & Power Company Limited, *"How We Generate Electricity,"*.

⁵ The Barbados Light & Power Company Limited, *"The Lamberts Wind Project,"* accessed February 24, 2021, <https://www.blpc.com.bb/index.php/company/our-projects/the-lambert-s-wind-project>.

⁶ The Barbados Light & Power Company Limited, *"The Clean Energy Bridge (CEB) Project"* accessed February 24, 2021, <https://www.blpc.com.bb/index.php/company/our-projects/the-clean-energy-bridge-ceb-project>

⁷ Ibid.

Since the 2014 - 2017 Standards of Service review⁸, BL&P was able to expand its customer base by 3.7%⁹, while also expanding its rollout of the Advanced Metering Infrastructure (AMI) programme, achieving 94% nationwide coverage in January 2021¹⁰.

The introduction of a Utility Scale FIT programme¹¹, which followed the initial FIT programme for projects generating up to 1 MW¹², seeks to further liberalize the domestic electricity generation landscape, through Wind/Solar PV projects of up to 10MW, further adjusting the role of the BL&P within the sector. Currently, independent power producers (IPP) across Barbados account for a total 41.77 MW of generated capacity¹³.

Participants in the BL&P's Renewable Energy Rider (RER) programme were 'grandfathered'¹⁴ into the national FIT programme for Wind, Solar PV, Biomass & Anaerobic Digestion systems up to and including 1 MW¹⁵. For these systems, the current rate structure, as set by the Commission, is delinked from fossil fuel prices, with electricity generation from solar PV and wind systems attracting rates of between BDS \$0.3625/kWh and \$0.5225/kWh. This new rate structure took effect from October 1, 2019¹⁶. Customers with systems 3KW and below are facilitated through the 'sale of excess', while systems above 3 KW, up to 1 MW utilize the 'buy all/sell all' mechanism.

Similarly, a Utility Scale FIT programme was established to facilitate further investment within the sector, while also seeking to catalyse the achievement of the 2030 targets,

⁸ Fair Trading Commission, Barbados, "Standards of Service for the Barbados Light & Power Company Ltd. 2014-2017" accessed February 24, 2021, https://www.ftc.gov.bb/library/sos/1417/2014-05-09_commission_decision_bl&pcl_sos.pdf.

⁹ Ibid. (From 126,190 customers to 130,858.)

¹⁰ The Barbados Light & Power Company Limited, "AMI Meters Installed," accessed February 24, 2021, <https://www.blpc.com.bb/index.php>.

¹¹ Fair Trading Commission, Barbados, "Decision on Feed-in-Tariffs for Renewable Energy Technologies above 1MW and up to 10 MW," accessed February 24, 2021, https://www.ftc.gov.bb/library/2020-09-29_commission_decision_blandp_feed-in-tariff_1-10MW.pdf.

¹² Fair Trading Commission, Barbados, "Decision and Order on Feed-in-Tariffs for Renewable Energy Technologies up to and Including 1 MW," accessed February 24, 2021, https://www.ftc.gov.bb/library/2019-09-16_commission_decision_final_FIT.pdf.

¹³ Based on Information provided through BL&P's regulatory reporting to the Commission.

¹⁴ "Grandfathering" is allowing an existing operation or conduct to continue legally when a new operation or conduct would be illegal.

¹⁵ Fair Trading Commission, Barbados, "Decision and Order on Feed-in-Tariffs for Renewable Energy Technologies up to and Including 1 MW,".

¹⁶ Ibid.

through the establishment of Wind & Solar PV projects of up to 10 MW¹⁷. These systems which also feature a rate structure delinked from fossil fuel prices, offer rates to IPPs of between BDS \$0.2025/kWh and \$0.2325/kWh¹⁸.

SECTION 2 – LEGISLATIVE FRAMEWORK

The Fair Trading Commission is empowered under the Fair Trading Commission Act, CAP. 326B (FTCA) and the Utilities Regulation Act, CAP. 282 (URA) of the Laws of Barbados to determine, monitor and review the Standards of Service applicable to regulated utilities. The role of the Standards of Service programme is to ensure

¹⁷ Fair Trading Commission, Barbados, *“Decision on Feed-in-Tariffs for Renewable Energy Technologies above 1MW and up to 10 MW,”*

¹⁸ Ibid.

operational consistency and outline the minimum standards of quality, customer service and reliability that must be met by the BL&P.

2.1 AUTHORITY TO ESTABLISH STANDARDS OF SERVICE

The Commission holds the view that Standards of Service are an important tool in ensuring that the BL&P provides a safe, efficient and reliable service to its consumers.

According to the FTCA, Standards of Service is defined at Section 2 as *'the quality and extent of service supplied by service providers.'*

Section 4(3) of the FTCA and Sections 3(1) and 4 of the URA set out the Commission's authority to determine the Standards of Service for a regulated entity and the considerations that must be given when determining the same. Rule 63(2) of the Utilities Regulation Procedural Rules 2003, S.I. 2003 No.104 (URPR) of the Laws of Barbados details the issues that may be included in the development of these Standards of Service. Together, these pieces of legislation provide the over-arching framework necessary for the development and establishment of the Standards of Service for a regulated sector.

Section 4(3) of the FTCA states, *inter alia*:

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

- (a) ...*
- (d) determine the standards of service applicable to service providers;*
- (e) monitor the standards of service supplied by service providers to ensure compliance;*
- (f) carry out periodic reviews of ... standards of service of service providers;"*

Section 3(1) (d) (e) (f) of the URA states, *inter alia*:

"The functions of the Commission under this Act are, in relation to service providers, to

- (a) ...
- (d) *determine the standards of service applicable;*
- (e) *monitor the standards of service supplied to ensure compliance; and*
- (f) *carry out periodic reviews of the ... standards of service."*

In exercising these functions, the Commission is charged with the responsibility, as stipulated in Section 3(3) (b) to:

- (a) *protect the interest of consumers by ensuring that service providers supply to the public service that is safe, adequate, efficient and reasonable; and*
- (b) *hear and determine complaints by consumers regarding billings and the standards of service supplied."*

Additionally, Section 4 of the URA states:

- "In determining standards of service, the Commission shall have regard to*
- (a) *the rates being charged by the service provider for supplying a utility service;*
 - (b) *ensuring that consumers are provided with universal access to the services supplied by the service provider;*
 - (c) *the national environmental policy; and*
 - (d) *such other matters as the Commission may consider appropriate."*

Rule 63 (2) of the URPR speaks to issues that may be considered when setting Standards of Service. It specifically indicates that:

- "Service standards may include issues such as*
- (a) *universality of service;*
 - (b) *the provision of new services;*
 - (c) *the extension of services to new customers;*
 - (d) *the maximum response time permitted for responding to customer complaints and queries; and*
 - (e) *standards related to service quality which are specific to each sector."*

2.2 REQUIREMENT TO CONSULT

The requirement for the Commission to consult with interested parties is derived from Section 4 (4) of the FTCA which dictates that, when exercising its powers to determine Standards of Service, the Commission must consult with specific parties.

Section 4(4) of the FTCA requires that:

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

2.3 FINES AND PENALTIES

The Standards of Service are binding on the BL&P. Sections 21, 31 and 38 of the URA, as well as Section 43 of the FTCA, prescribe the penalties that accrue where the utility fails to comply with the prescribed targets under the Guaranteed Standards of Service (GES) and the Overall Standards of Service (OES). Where there is a continuous failure to attain a target, the Commission will require an explanation from the BL&P; Further, the Commission reserves the right to impose a penalty, pursuant to Section 38(c) (i) of the URA.

Section 21 of the URA indicates that:

“Where a service provider fails to meet prescribed standards of service, the service provider shall make to any person who is affected by the failure such compensation as may be determined by the Commission.”

Section 38 of the URA stipulates that:

“The Commission may make

(a) rules;

(b) regulations; and

(c) orders with respect to

(i) imposing penalties for non-compliance with prescribed standards of service; and

(ii) prescribing amounts to be paid to the person referred to in section 21 for failure to provide a utility service in accordance with the standards of service set by the Commission.”

Section 43 (1) of the FTCA, which is mirrored at Section 31 of the URA, stipulates that a service provider will be guilty of an offence for failure to comply with an order of the Commission and is liable to a fine of \$100,000 if convicted.

Section 31(1) of the URA asserts that:

“Every service provider which fails or refuses to obey an order of the Commission made under this Act is guilty of an offence and is liable on summary conviction to a fine of \$100,000 and, in the case of a continuing offence, to a further fine of \$10,000 for each day or part thereof during which the offence continues.”

Section 43(1) of the FTCA states that:

“Every service provider or business enterprise that fails or refuses to obey an order of the Commission made under this Act is liable on summary conviction to a fine of \$100,000 and, in the case of a continuing offence, to a further fine of \$10,000 for each day or part thereof during which the offence continues.”

SECTION 3 – DEFINITION OF EXISTING GUARANTEED & OVERALL STANDARDS

This section seeks to provide clarity about the definitions of each existing Standard, while also outlining specific exemption circumstances, which allow for deviation from the prescribed benchmarks.

3.1 GUARANTEED STANDARDS: DEFINITIONS & SPECIFIC EXEMPTIONS

GES 1 - Fault Repair - Customer Service (Restore supply after a fault on the customer's service)

Definition

The BL&P shall restore the electricity supply within eight (8) hours of a fault being reported on an individual customer's service. Fault events which qualify for consideration include but are not limited to:

- a) problems or defects at the metering point;
- b) broken or defective service wires;
- c) defective distribution transformers;
- d) blown fuses;
- e) intrusion of tree branches beyond service line clearing distance; and
- f) fallen poles due to fractures or poor maintenance.

Where the BL&P fails to achieve the fault repair target, it shall credit the affected customer's account with the value which corresponds to the customer's class: \$45.00 (D), \$90.00 (GS) or \$215.0 (SVP/LP). Thereafter, the same level of compensation is applicable for each additional eight (8) hours the customer remains without service, prorated on an hourly basis where appropriate. Where it is evident that the customer's and the BL&P's distribution equipment are both defective, liability must be shared equally.

Customers are responsible for the maintenance of the electrical wiring infrastructure and equipment at their residence up to the service point. The BL&P is responsible for the maintenance of the utility meter and the electrical infrastructure, beyond the service point or weather-head; This includes the service wire. While the BL&P has responsibility for tree-trimming in public areas, customers should ensure that the encroachment of any tree

branches near service wires within their property, are trimmed and kept within a safe clearance.

The BL&P may be relieved from liability for breach of this standard under the following specific circumstances:

Specific Exemptions:

- Where it is discovered that only the customer's equipment is defective, e.g. defective meter socket base, load ends, underground cables, or faulty wiring; and
- Where the fault is due to encroachment of trees on the service wire within the property of the customer or another adjoining property.

GES 2 - Fault Repair - Distribution System (Restore supply after fault on the electrical distribution system (multiple customers))

Definition

Where a fault on a distribution system affects multiple customers, the BL&P shall restore the electricity supply within eight (8) hours of receipt of the report. The nature of the fault includes any event which originates from the Generation and Transmission domains, thereby impacting service continuity on the distribution network, and is also inclusive of events specific to the distribution domain. Faults which uniquely interrupt the means to provide an adequate and continuous electricity service to customers via feeders will qualify.

Where the BL&P fails to achieve the target for the restoration of supply, it shall credit each affected customer's account with the value which corresponds to the customer's class: \$45.00 (D), \$90.00 (GS) or \$215.00 (SVP/LP). Thereafter, the same level of compensation is applicable for each additional eight (8) hours the customer remains without service, prorated on an hourly basis where appropriate.

Specific Exemptions:

- Where the outage is due to an unforeseeable fault on an underground cable due to no fault of the BL&P, and the prevailing conditions are such that it is not practical for the BL&P to be able to locate, excavate and repair the fault within the stipulated 8-hour time frame; and
- Where the service interruption is caused by an event which is beyond the BL&P's control, e.g. vehicular accidents.

GES 3 - Voltage Complaint (Investigation of voltage complaint)

Definition

The BL&P shall investigate voltage issues within twenty-four (24) working hours of receipt of the report. Where the voltage supplied to the customer is discovered to be outside of the permitted power quality standard ($\pm 6.0\%$) of nominal voltage and cannot be rectified immediately, the BL&P is required to provide an assessment of the problem within five (5) working days. The BL&P shall rectify the problem within thirty (30) working days of receipt of the original complaint. Failure of the BL&P to investigate, provide assessment and resolve voltage complaints within the times specified constitutes a breach, and will require the BL&P to credit the affected customer's account with the value which corresponds to the customer's class \$45.00 (D), \$90.00 (GS) or \$215.00 (SVP/LP) in each instance.

The customer is responsible for the maintenance of the electrical wiring and equipment at the residence; this includes surge protection, which should be checked periodically, to ensure a reasonable level of protection. Where it is evident that anomalies exist on the customer's side and the BL&P's side, liability should be equally shared.

Specific Exemptions:

- Where the customer's electricity demand has increased 'significantly' and was not made known to the BL&P;
- Where it is discovered that a customer on the local feeder is operating heavy equipment (e.g. welding equipment, large motors) on a service for which it was not designed;
- Where defects exist in the customer's installation (e.g. grounding, wiring, unbalanced loads, harmonics or transient voltages);
- Where there are signs of: ingress of moisture, corrosion at terminals or loose lugs, in the meter socket base, etc.;
- Where defects in the customer's equipment exist; and
- Where work delays may result due to obtaining permission from the property owners or the Town and Country Development Planning Office. Such difficulties must be communicated to the customer.

GES 4 - Simple Service Connection and Interconnection of IPPs (Provide a simple service connection - connection point within 30 metres)

Definition

The BL&P shall connect all new services, which are within thirty (30) metres of an existing circuit, within twelve (12) working days of a customer signing the contract for connection and presenting a valid certificate of inspection from the Government Electrical Engineering Department (GEED).

Where a RE system or energy storage system is required to be connected to the electricity grid pursuant to the submission of all the requisite documentation, the BL&P shall

connect the RE system in accordance with the approved Grid Code within thirty (30) working days of receipt of said documentation.

Where the BL&P fails to connect the customer within the time specified, it shall credit that customer's account with a rebate of the applicable installation fee.

Specific Exemptions:

- Where the incorrect address/directions are given; and
- Where the required signatory is not the owner of the system.

GES 5 - Cost Estimate (Provide a cost estimate for complex connections requiring a service visit)

Definition

The BL&P shall provide a cost estimate for a new or altered supply within twenty-five (25) working days of a customer's request. Where the BL&P fails to achieve this target, it shall credit the affected customer's account with the value which corresponds to the customer's class \$45.00 (D), \$90.00 (GS) or \$215.00 (SVP/LP).

Specific Exemptions:

- Where the submitted documentation does not meet the stipulated engineering standards for documents of this nature e.g. engineering diagrams, technical system documents etc.;
- Where the customer fails to provide the requisite information for the determination of the estimated costs; and
- Where delays occur due to difficulties in obtaining the required permissions from property owners and/or the Town and Country Development Planning Office. Such difficulties must be communicated to the customer.

GES 6 - Connect or Transfer of Service (Connect or transfer of a service to an existing installation)

Definition

The BL&P shall connect or transfer an electricity service where there is a meter already installed on the premises, within twelve (12) working hours of the customer signing the requisite service contract. Where the BL&P fails to achieve this target, it shall credit the customer's account with the value which corresponds to the customer's class \$45.00 (D), \$90.00 (GS) or \$215.00 (SVP/LP).

Specific Exemption:

- Where the service has been disconnected for more than six (6) months and/or requires a valid certificate of inspection from the GEED before it can be connected.

GES 7 - Reconnection (Reconnection of service on settling the bill after disconnection at the meter)

Definition

The BL&P shall reconnect the electricity service for all AMI meters within two (2) working hours of verification of payment and for all other meters, within six (6) working hours, after payment of the bill and the reconnection fee at the BL&P's office. Where payments are made at an external agency, the customer must notify/call the BL&P's customer service department and provide proof of payment (receipt number for the bill payment and reconnection fee), in order to benefit from the aforementioned two (2) and six (6) working hour reconnection times.

Where the BL&P fails to reconnect a customer within the time allocated, it shall credit the customer's account with the value which corresponds to the customer's class \$45.00 (D), \$90.00 (GS) or \$215.00 (SVP/LP).

Specific Exemption:

- Where a customer utilises an external payment location other than the BL&P office, and fails to contact the BL&P to provide proof of payment.

GES 8 - Response to Billing Complaints (The time frame in which the BL&P responds to customer billing complaints)

Definition

The BL&P shall provide resolution to written or emailed billing complaints within three (3) working days of receipt of complaint. Where the BL&P considers that a service visit is required, the BL&P shall provide an assessment and resolution within eight (8) working days of receipt of the complaint. A response is deemed to have been provided when the BL&P communicates its findings to the customer orally, in writing or electronically. The findings of the investigation shall include what provisions are being made to rectify the problem and a time frame for rectification. A tracking number shall be issued to each complainant for ease of reference.

Where the BL&P fails to comply with the target for resolution of written or emailed billing complaints, or fails to visit the customer where appropriate, it shall credit the customer's account with the value which corresponds to the customer's class \$45.00 (D), \$90.00 (GS) or \$215.00 (SVP/LP) in each instance.

Specific Exemption:

- Where notice is provided to the customer either orally or in writing, notifying them of challenges in accessing the customer's premises, as a result of locked gates, aggressive/unrestrained animals, etc.

GES 9 - Timely Payment of Compensation

Definition

This refers to the timely payment of compensation for breaches. Where the BL&P is in breach of the Guaranteed Standards of Service and automatic compensation is required, the assigned compensation shall be credited to the customer's account within two (2) months of confirmation of the breach. Where the breach requires the affected customer to initiate a claim, the BL&P shall credit the customer's account within two (2) months of acceptance of the claim. Where the BL&P fails to achieve either target, it shall further credit the affected customer's account with the value which corresponds to the customer's class \$45.00 (D), \$90.00 (GS) or \$215.00 (SVP/LP).

Specific Exemption:

- Where a circumstance exists, beyond the control of the BL&P that prevents/inhibits the timely processing of the claim.

3.2 OVERALL STANDARDS: DEFINITIONS & SPECIFIC EXEMPTIONS

OES 1 - Meter Reading (Frequency of meter reading)

Definition

The BL&P shall read all AMI meters for Domestic, General Service, Secondary Voltage Power and Large Power customers monthly. All other meters shall be read at least every

two (2) months. With respect to AMI meters, all readings to be published on bills must be verified monthly.

Where AMI and non-AMI meters readings are in question and this initiates a site visit, the accuracy of the readings must be within the accepted Standard as per the American National Standards Institute (ANSI C12.20).

Specific Exemption:

- Where access to the customer's premises is restricted, resulting in the meter being inaccessible to the meter reader (e.g. aggressive/unrestrained animals or a locked gate). In these cases, the BL&P shall inform the customer of the situation and arrange to have the situation corrected.

OES 2 - Voltage Complaints (Response to Complaint of high/low voltage)

Definition

All voltage complaints shall be responded to within twenty-four (24) working hours of receipt.

Specific Exemption:

n/a

OES 3 - Outage Notice (Prior notice of outages)

Definition

All potentially affected customers shall be notified of a planned outage at least forty-eight (48) hours before the outage is instituted.

Specific Exemption:

n/a

OES 4 - Response to Complaints and Claims (Response to Written Claims related to Standards of Service) (Amended)

Definition

All written complaints and claims for breaches of the Standards of Service shall be acknowledged within five (5) working days of receipt of the claim. Acknowledgements received via a verbal telephone call, emailed or printed correspondence from the BL&P's representative shall be deemed as appropriate.

Specific Exemption:

n/a

OES 5 - Call Centre Answering (Billing and Trouble Centre calls answered by a customer service representative)

Definition

At least 85% of all calls to the BL&P's Billing and Trouble Centre shall be answered within one (1) minute.

Specific Exemption:

- Where the volume of calls received during the period of an outage on one (1) or more feeders do not permit them to be answered within the required time (e.g. during major outages) i.e. where more than one third of the customer base is impacted).

OES 6 – Billing Period (Period between two meter readings whether interim, estimated or actual)

Definition

All bills issued to customers with AMI meters in any billing cycle shall be invoiced for no more than thirty-one (31) days of service. For all other customers with non-AMI meters, all bills issued per billing cycle, shall reflect no more than thirty-three (33) days of service.

Specific Exemption:

- Where access to the premises is restricted or the meter is inaccessible to the meter reader (e.g. aggressive/unrestrained animals or a locked gate). In these cases, the BL&P shall inform the customer of the situation and arrange an appointment to have the situation corrected.

**OES 7 – Response to Damage Claims (Acknowledgement and settlement of claims)
(Amendment)**

Definition

The BL&P shall acknowledge 95% of damage claims; immediately for oral claims, and within five (5) working days for written claims.

A minimum of 95% of damage claims are expected to be settled within two (2) months of receipt of the written or oral claim.

Specific Exemptions:

- Where the lack of access to the customer's equipment hinders the BL&P's investigation. In such a case, the BL&P shall inform the customer of the situation and arrange an appointment to have it corrected; and
- Where the customer fails to provide all the requisite information concerning the claims.

SECTION 4 -REVIEW OF THE BL&P'S STANDARDS OF SERVICE PERFORMANCE

4.1 OBJECTIVES

The BL&P's Standards of Service are intended to set a minimum benchmark for the delivery of electricity service. These Standards allow the Commission to monitor the performance of the BL&P.

Through these Standards of Service, the Commission seeks to:

- ensure that a minimum QoS is maintained;
- provide incentives for improvement in the QoS;
- create conditions for customer satisfaction;
- monitor service quality; and
- protect the interests of consumers of electricity.

The Standards of Service are divided into two categories, Guaranteed Standards of Service (GES) and Overall Standards of Service (OES); Together, they define the minimum level of service quality to be delivered by the BL&P. Compliance with these Standards is mandatory, such that the Commission in its discretion may impose a penalty for non-compliance.

4.2 GUARANTEED STANDARDS OF SERVICE

The Guaranteed Standards of Service (GES) outline the minimum levels of service quality which the BL&P must attain in the delivery of electricity supply to individual customers. Failure to meet the level of service stated requires the BL&P to compensate individually affected customers; this is subject to specific exemptions, which are presented later.

The levels of compensation are intended to act as an incentive for the BL&P to improve service delivery. Compensation is currently automatic for six (6) of the nine (9) Guaranteed Standards of Service.

Automatic compensation, in respect of a breach by the BL&P, appears as a credit on the customer's next bill, once eligibility is verified.

4.2.1 THE BL&P'S PERFORMANCE UNDER THE GUARANTEED STANDARDS OF SERVICE

An assessment of the BL&P's performance over the three-year period was conducted based on the information submitted quarterly to the Commission; the results are presented in Table 1 on pages 33 - 36.

The BL&P's performance level over the period April 1, 2018 to December 31, 2020 was acceptable across most of the benchmarks outlined in the Standards of Service.

Fault Repair Customer's Service (GES 1)

Overall, the BL&P's compliance averaged 90.85% over the review period for restoring supply to individual customers within eight (8) hours of the fault event being reported. Annual compliance for April 2019 to March 2020 improved 1.95 percentage points from the previous period's average, but this level contracted by 5.04 percentage points at the end of December 2020.

Fault Repair Distribution System (GES 2)

Multiple customers had their service restored within the eight (8) hour target over the period under review; Overall, compliance for this standard was 77.11%, compared to the peak performance recorded of 98.76% for the period April 2018 to March 2019. Similarly, the annual performance for April - December 2020 was good, with 95.84% compliance at

the end of December 2020. However, the average performance for April 2019 to March 2020 returned 0.06 percentage points below the overall average (77.11%), this was as a result of the island-wide power outages on November 18 and 19, 2020.

Investigation of Voltage Complaints (GES 3)

In terms of visiting the site of voltage complaints as mandated under GES 3(a), within the twenty-four (24) hour target time, the BL&P achieved an average compliance of 96.62%. The compliance level peaked at 98.14% for the first reporting period April 2018 to March 2019, but subsequently fell by 3.05 and 2.3 percentage points for the April 2019 to March 2020 and April to December 2020 periods, respectively. Despite this, compliance was generally high.

Similarly, average compliance for the assessment of complaints as mandated under GES 3(b), within five (5) working days of receipt of complaint, was reasonably high (98.92%). For April 2019 to March 2020 compliance was 1.34 percentage points less than the peak level 99.36% which was recorded in the previous period. However, this improved by the end of December 2020 by 1.15 percentage points.

Likewise, as it relates to rectifying voltage issues as mandated under GES 3(c), within thirty (30) working days of receiving complaint, the BL&P's average compliance was 93.59% over the period under review.

Simple Service Connections (GES 4)

Connections to customer's premises within 30 meters of the connection point - registered a high level of compliance, above 90% for the first two years of the review period. However, there was a marked decrease in the average compliance level for the April - December 2020 period, which witnessed reduced compliance of 82.44%. This resulted in an acceptable overall compliance of 91.15% for the April 2018 to December 2020 period. The compliance was highest at the end of March 2019 at 96.04%, with this value

contracting by 4.09 percentage points at the end of March 2020 and 10.42 percentage points at the end of December 2020.

Complex Connections (GES 5)

The BL&P consistently achieved a perfect compliance level (100%) for providing cost estimates for complex connections within thirty days of receiving all of the requisite information, over the period under review.

Connect or Transfer of Service (GES 6)

Under GES 6, a consistently high compliance level of above 96% was achieved by the BL&P over the review period April 2018 to December 2020. Customer connection or transfer of service requests were executed by the BL&P on average, 98.28% of the time within the twelve (12) working hour target stipulated. The level of compliance improved by 2.25 and 2.81 percentage points for the periods April 2019 to March 2020 and April to December 2020, respectively, from the 96.77% mark registered for April 2018 to March 2019.

Reconnection (GES 7)

The BL&P achieved a high compliance level for the reconnection of service upon settling outstanding bills, where disconnection was at the meter. Overall, 99.33% compliance was achieved for GES 6, which mandates the completion of customers' reconnection of service within six (6) working days of receipt of payment.

Response to Billing Complaints (GES 8)

Under GES 8(a), for all Billing Complaints which require a service visit, the BL&P is required to provide an assessment and resolution within ten (10) working days of receipt of complaint. Performance in relation to this Standard was commendable, with an average compliance level of 99.40% being returned. For all other billing matters executed by the BL&P, where a site visit is not required, GES 8(b) mandates the resolution of such complaints within three (3) working days of receipt. Compliance with this benchmark was sound, at 97.78%. These statistics reflect a high level of performance over the period April 2018 to December 2020.

Timely Payment of Compensation (GES 9)

As it relates to the application of credit to customers' accounts on acceptance of claims, within two (2) months as prescribed by the Standard, an average compliance of 98.13% was achieved for the period under review. The compliance level improved by 3.76 percentage points from the initial period, to peak at 100% for the April 2019 to March 2020 period, while for the final period there was a marginal decline in compliance by less than one percentage point.

Table 1: The BL&P’s Guaranteed Standards Performance Assessment 2018-2020

STANDARD	TARGET	COMPENSATION	AVERAGE (%) COMPLIANCE		
			APR. 2018 - MAR. 2019	APR. 2019 - MAR. 2020	APR. 2020 - DEC. 2020
<p>GES 1 Fault Repair - Customer’s Service This refers to the time it takes to restore supply after fault on customer’ service (single customer)</p>	Within 8 hours of receipt of complaint.	\$45.00 (D) \$90.00 (GS) \$215.00 (SVP/LP) For each additional eight (8) hours Prorated on an hourly basis Automatic Compensation¹⁹	91.33	93.28	88.24
<p>GES 2 Fault Repair - Distribution System This refers to the time it takes to restore supply after fault on the distribution system (multiple customers).</p>	Within 8 hours of receipt of complaint.	\$45.00 (D) \$90.00 (GS) \$215.00 (SVP/LP) For each additional eight (8) hours Prorated on an hourly basis Customer Initiated Claim Required.	98.76	77.05 ²⁰	94.96
<p>GES 3 Voltage Complaint This refers to the investigation and correction of voltage complaints.</p>	(a) Visit within twenty-four (24) working hours of receipt of the complaint. (b) Provide an assessment within five (5) working days ²¹ of	\$45.00 (D) \$90.00 (GS) \$215.00 (SVP/LP) Automatic Compensation	98.14 99.36	95.09 98.02	95.84 99.17

¹⁹ Automatic compensation refers to the initiation of the compensation process by the BL&P where a breach has occurred.

²⁰ With the BL&P’s revised statistics for October to December 2019 the annual average returned was 97.37%. The Commission however accepts the statistics submitted for this period, as supported by correspondence dated May 4, 2020 which shows the ratio of 250,630/325,403 events under GES 2. The annual compliance under GES 2 of 77.05% and total breaches of 74,773.

²¹ “Working Days” refers to Mondays to Fridays from 8:00 a.m. to 4:00 p.m. only and excludes public

STANDARD	TARGET	COMPENSATION	AVERAGE (%) COMPLIANCE		
			APR. 2018 - MAR. 2019	APR. 2019 - MAR. 2020	APR. 2020 - DEC. 2020
	receipt of complaint. (c) Correct within thirty (30) working days of receipt of complaint.		92.86	95.65	92.59
GES 4 Simple Service Connection This refers to the time it takes to provide a single service connection (connection point within 30 meters) after signing the contract for connection and the presentation of a valid certificate of inspection from the Government Electrical Engineering Department (GEED) by the customer	Within twelve (12) working days of receipt of request.	Refund of installation fee Automatic compensation	96.09	92.00	82.44
GES 5 Complex Connection - Cost Estimate This refers to the time it takes to provide a cost estimate for a complex connection requiring a service visit from the time of	Within thirty (30) workings days of receipt of request.	\$45.00 (D) \$90.00 (GS) \$215.00 (SVP/LP) Customer Initiated Claim Required.	100	100	100

holidays and weekends. In measuring the response time for targets expressed in terms of working days, the day the complaint is made is excluded. Any other reference to days means calendar days.

STANDARD	TARGET	COMPENSATION	AVERAGE (%) COMPLIANCE		
			APR. 2018 - MAR. 2019	APR. 2019 - MAR. 2020	APR. 2020 - DEC. 2020
provision of all the requisite information.					
GES 6 Connect or Transfer of Service This refers to the time it takes to connect or transfer service from one location to another location which has an existing installation.	Within 12 working hours ²² of receipt of request.	\$45.00 (D) \$90.00(G S) \$215.00 (SVP/LP) Automatic compensation	96.77	99.02	99.58
GES 7 Reconnection This refers to the time for reconnection of service on settling the bill after disconnection at the meter	Within six (6) working hours of receipt of payment.	Refund of reconnection fee Automatic Compensation	98.95	99.65	100
GES 8 Response to Billing Complaints This refers to the timeframe in which the BL&P responds to customer billing complaints	(a) Where a service visit is required, provide an assessment and resolution within ten (10) working days of receipt of complaint.	\$45.00 (D); \$90.00 (GS); \$215.00 (SVP/LP) Customer Initiated Claim required	99.36	100	100
	(b) For all other matters not requiring a		100	ND ²³	75

²² "Working hours" are between 8:00 a.m. and 4:00 p.m. on a working day.

²³ No claims were submitted.

STANDARD	TARGET	COMPENSATION	AVERAGE (%) COMPLIANCE		
			APR. 2018 - MAR. 2019	APR. 2019 - MAR. 2020	APR. 2020 - DEC. 2020
	service visit, the BL&P is required to resolve these within three (3) working days of receipt of complaint.				
GES 9 Timely Payment of Compensation This refers to the time in which the BL&P shall apply compensation to a customer's account on acceptance of a claim.	(a) All credits to be applied to the customers' accounts within two (2) months of occurrence of a breach where automatic compensation is applicable and within two (2) months of acceptance of a Customer Initiated Claim, where applicable.	\$45.00 (D) \$90.00 (GS) \$215.00 (SVP/LP) Automatic Compensation	96.24	100	99.39 ²⁴

Key: D - Domestic; GS - General Service; SVP - Secondary Voltage Power; LP - Large Power

Q 1: Should the current target levels for the Guaranteed Standards of Service be amended?

Q 2: Is the level of compensation adequate under each of the Guaranteed Standards of Service categories?

4.2.2 CUSTOMER CLAIMS

²⁴ No data was submitted for April to June, and July 2020. The BL&P indicated that records would be dependent on the Commission's Decision.

Overview

The Commission remains concerned about the continuing trend of underutilisation of customer-initiated (manual) claims. In fact, 82.61% of customers eligible to submit manual claims within the review period, did not do so, and as such this compensation remained unpaid. A synopsis of customer compensation claims processed by the BL&P is presented in Table 2 below.

The Commission has observed that the bulk of eligible claims attracted automatic compensation. Further, there was a downward trend observed in terms of the number of claims requiring automatic compensation over the review period, with declines of 30.40% and 44.32% for the periods April 2019 to March 2020, and April 2020 to December 2020, respectively, when compared to the first year of the review period, April 2018 to March 2019. Conversely, the number of manual claims increased by 50% and 110%, respectively, when compared to the first year of the review period.

The ratio of manual claims paid, compared to eligible claims submitted, remains low, at 30%, 33.33% and 0% respectively, for the three (3) time periods: 2018-2019, 2019-2020, and April 2020 – December 2020. However, all of the manual claims submitted under the review period were paid. It was observed that the relative under-performance under GES 2, compared to other Guaranteed Standards requiring Manual Claims (GES 5 & GES 8) as evident in table 1 above, suggest that the majority (almost 100%) of manual claims arise from the BL&P's failure to repair faults within the distribution system within the stipulated 8-hour timeframe.

Overall, the BL&P resolved 99.25% of all eligible claims submitted over the review period. The Commission is of the view that greater operational efficiencies and an overall improved QoS for customers may be realised by removing the requirement for manual claims by customers, therefore providing automatic compensation to customers for breaches of all Guaranteed Electricity Standards, except for issues of billing complaints (GES 8).

Table 2: Customer Compensation for 2018 – 2020

CATEGORY	April, 2018 – March, 2019	April, 2019 – March, 2020	April – December 2020
Persons eligible for compensation	283	205	170
Persons actually receiving compensation	307	196	159
Percentage of eligible customers receiving compensation	108.48%	95.61%	93.53%

Key: A – Automatic; M – Manual (Customer-Initiated)

Claims Discussion

By the end of 31 March, 2018, a total of 48 claims from the previous period, valued at \$1,919.50 remained unpaid. Over the review period 1 April 2018 to 31 December, 2020, six hundred and fifty-eight (658) automatically generated and customer-initiated claims were eligible for \$32,290.00 in compensation. Of this combined total, 91.86% was disbursed, as \$31,424.25 of the total \$34,209.50 due, was paid. Based on the statistics in table 2 above, six hundred and sixty-two (662) claims were paid over the review period. The Commission is satisfied that the claims submitted were resolved at a reasonable rate.

The Commission has also had challenges with the reoccurring submission of erroneous information. As such, the Commission has and will continue to require, that where errors are discovered and reported to the BL&P, the specific errors must be corrected and highlighted for ease of reference, and a reason of the discrepancies indicated when reports are submitted. Further, the Commission is considering the imposition of a penalty for the submission of erroneous information by regulated entities.

Q 3: Do you agree that Customer compensation should be ‘Automatic’ for all breaches of the Guaranteed Electricity Standards (GES), except in circumstances of a billing complaint (GES 8)?

4.3 OVERALL STANDARDS OF SERVICE

The Overall Standards of Service (OES) are designed to reflect the general performance of the BL&P on an island-wide basis and are not defined by the individual service a customer receives. No compensation is given to customers for failure to meet Overall Standards. The Commission, however, has the legislative power to impose penalties for non-compliance with the OES targets. At present, the Commission enforces seven (7) Standards under the OES; an assessment of the BL&P’s performance under the Overall Standards of Service for the period 2018 – 2020 follows in Table 3 on pages 42 & 43.

4.3.1 THE BL&P’S PERFORMANCE UNDER THE OVERALL STANDARDS OF SERVICE

Meter Reading - OES 1

The BL&P’s average level of compliance over the period in review under the customer classes OES 1 (a) domestic, and OES 1 (b) commercial registered 96.60% and 97.32%, respectively. Compliance fell by 3.80% at the end of December 2020, after being generally consistent, at approximately 97.65% over the first two years of the review period.

Historically, the BL&P has not met the benchmarks for the aforementioned metering categories. Over the period under review, this trend continued despite the gradual transition to Advanced Metering Infrastructure (AMI) technology initiated in 2016. However, the Commission notes that while some improvement in compliance was realised as the AMI deployment ensues, greater metering efficiency and added

technological benefits are anticipated after this project concludes. There are currently 130,371 AMI meters installed which represents a 94% target completion²⁵.

Voltage Complaint (OES 2)

Investigations into voltage issues registered consistently high compliance over the review period, despite not meeting the 100% benchmark. For the first two (2) years of the review period, each compliance level fell short of the required target by less than 3%. However, the average compliance level returned for the entire review period April 2018 to December 2020 was 98.34%.

Outage Notice (OES 3)

Notification of planned maintenance activities on the electricity grid continues to meet the 100% target requirement on a consistent basis.

Response to Complaints and Claims (OES 4)

The BL&P’s compliance level with regard to the acknowledgement of complaints and claims returned perfect compliance, annually and therefore overall. While this perfect level of compliance is commendable, the Commission remains concerned that many customers who are eligible to receive customer-initiated claims, do not submit a claim, and therefore do not receive compensation.

The Commission remains cognisant of the importance of public education with regard to Standards of Service and is actively enhancing its communication and public relations strategy to ensure that greater clarity and efficiency of information is provided, as well as considering possible changes to the Standards as outlined in Section 5 below.

²⁵ The Barbados Light & Power Company Limited, “AMI Meters Installed,”.

Call Centre Answering (OES 5)

The prompt attention to customer calls is an important facet of customer quality measurement systems. For the entire review period, the average compliance level for answering telephone calls by a BL&P's representative within the one (1) minute barrier was 75.9%. However, the annual statistics for the first two (2) years of the review period shows that the compliance level fell short of the 85% target, by less than 2% per year. The Commission notes that this compliance level was generally consistent for these two years, and the failing of the BL&P in meeting the stipulated target is concerning. Historically, the BL&P continues to be challenged in meeting this target; For the April 2020 – December 2020 review period, the compliance level plummeted to 57.18%.

The COVID-19 pandemic and associated national policy restrictions²⁶ may have contributed to this low level of compliance. However, this global pandemic has highlighted the need for better contingency planning to address unforeseen circumstances, in an attempt to limit the severity of impact on customers.

Billing Period (OES 6)

Generally, the compliance level met and exceeded the 95% benchmark across the period reviewed. Overall, the BL&P's performance average was 97.99% for the entire review period April 2018 to December 2020.

Response to Damage Claims (OES 7)

The efficient acknowledgement and settlement of damage claims is another pertinent feature in customer quality measurement systems. The BL&P's compliance level in the acknowledgement of claims OES 7 (a) exceeded the 95% target. However, in relation to the settlement of claims under OES 7 (b), the compliance level was 21.82 percentage

²⁶ National Policy Directives were implemented in March 2020.

points less for the April 2019 to March 2020 period compared to the 100% level achieved in the first year. For the period April - December 2020 a 92.95% compliance level was registered, which was 2.05% below the target level. The average compliance for the period April 2018 to December 2020 was 85.93%, well below the benchmark of 95%.

Table 3: The BL&P’s Overall Standards Performance Assessment (2018-2020)

STANDARD	TARGET	AVERAGE (%) COMPLIANCE		
		APR. 2018 - MAR. 2019	APR. 2019 - MAR. 2020	APR. 2020 - DEC. 2020
OES 1 Meter Reading Frequency of meter reading	(a) 100% of Domestic/ General Service customers’ meters to be read every two months	97.66	97.64	93.84
	(b) 100% of Secondary Voltage Power and Large Power customers’ meters to be read monthly	97.10	97.36	97.55
OES 2 Voltage Complaints Response to Complaint of high/low voltage	100% of complaints to be responded to within twenty-four working hours of receipt	98.61	97.65	99.17
OES 3 Outage Notice Prior notice of outages	In 100% of instances of planned outages, all potentially affected customers are to be notified 48 hours before the outage.	100	100	100
OES 4 Response to Claims Response to Written Claims related to Standards of Service	100% of customers’ complaints and claims to be acknowledged within 5 working days of receipt.	100.00	100	100
OES 5 Call Centre Answering Billing and Trouble Centre	85% of calls answered by a representative within one (1) minute	83.37	83.75	57.18

STANDARD	TARGET	AVERAGE (%) COMPLIANCE		
		APR. 2018 - MAR. 2019	APR. 2019 - MAR. 2020	APR. 2020 - DEC. 2020
calls answered by a customer service representative.				
OES 6 Billing Period The period between two meter readings whether interim, estimated or actual.	At least 95% of customers in each billing period shall be invoiced for no more than 33 days.	97.60	97.70	98.82
OES 7 Response to Damage Claims Acknowledgement and settlement of claims.	(a) Acknowledge 95% of damage claims immediately on receipt of oral claims and for written claims, within 5 working days of receipt.	100.00	100	100
	(b) Settle 95% of damage claims within 2 months of receipt of written or oral claim.	100.00	78.18	92.95

Q 4: Should the current target levels for the Overall Standards of Service be amended? Please provide details.

Q 5: Are there any specific changes that you would like to see made to the existing Standards of Service? Please provide details.

Q 6: Is there any new Guaranteed or Overall Standard of Service that you would like to see introduced? Please provide details.

Q 7: Is there any existing Guaranteed or Overall Standard of Service that you believe should be removed? Please provide details.

4.4 RELIABILITY PERFORMANCE

The Commission considers that, in addition to the evaluation of overall performance metrics, reliability indices²⁷ provide a measure of system-wide service delivery to its customers. These are derived from the duration and number of power outages experienced and the number of affected customers. The length of time and the number of times a customer is without electricity relates to sustained outages, i.e. where customers experience a loss in supply or interruption beyond a specified period, typically greater than one minute in duration. A sustained outage refers to any interruption which is not classified as a momentary event and these typically last more than five (5) minutes.

Utilities classify these outages based on different times between one (1) to five (5) minutes. The Institute of Electrical and Electronic Engineers (IEEE) has adopted the five (5) minute criteria. The BL&P currently uses the IEEE's five (5) minute definition for sustained outages. The Commission notes that this definition varies across electricity suppliers and jurisdictions. Due to this inconsistency, the criteria and methodology used to determine Major Event Days²⁸ differ as well. This creates a challenge in comparing reliability performance with other utilities. Definitions of the indices currently adopted to monitor the BL&P's performance are given below, based on the IEEE definitions.

System Average Interruption Duration Index (SAIDI) – SAIDI captures the average number of minutes that a customer is without an electricity supply over a specified time period (e.g. monthly). This is computed as the sum of the duration, pertaining to each sustained interruption (in hours), divided by the total number of customers. SAIDI

²⁷ See the, Institute of Electrical and Electronic Engineers, *Institute of Electrical and Electronic Engineers (IEEE) Guide for Electric Power Distribution Reliability Indices, 1366-2003, 2004 ed. (USA: IEEE, 2004)*.

²⁸ IEEE 1366 Standard determines Major Event Days (MEDs) – these are days which exceed the threshold computed and the event(s) excluded from the indices calculation. The BL&P currently employs this method for SAIDI determination.

excludes momentary interruptions²⁹ (one minute or less). Mathematically, this is represented by:

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

System Average Interruption Frequency Index (SAIFI) – SAIFI represents the average number of times a customer’s supply is interrupted (e.g. each month). It is calculated as the sum of each sustained customer interruption divided by the total number of customers. SAIFI excludes momentary interruptions. Mathematically, this is represented by:

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

Customer Average Interruption Duration Index (CAIDI) – CAIDI is the average duration of each supply interruption per customer. This is computed as the sum of the duration of each sustained customer interruption (in hours) divided by the total number of sustained customer interruptions (SAIDI divided by SAIFI). CAIDI excludes momentary interruptions. Mathematically, this is represented by:

$$\text{CAIDI} = \frac{\text{Total Customer Hours of Interruption}}{\text{Total Number of Customer Interruptions}}$$

Average Service Availability Index (ASAI) - ASAI measures the percentage of time that a customer receives an electricity service over a defined reporting period³⁰. An annual ASAI of 99.994 %³¹ of the electricity distribution system represents a good measure of

²⁹ The (IEEE) 1366 standards, (2004), page 3 defines a momentary interruption as a single operation of an interrupting device that results in a voltage zero. Typically, these are outages which occur and last 5 minutes or less. These can cause voltage spikes and impact sensitive electronic equipment.

³⁰ ASAI is usually reported annually; it should be noted that a normal calendar year has 8760 hours, whereas a leap year has 8784 hours. See IEEE 1366 Standards 2003, p 6.

³¹ An ASAI of 99.994% equates to a total outage duration of thirty (30) minutes per year.

service availability. An indication of availability of electricity service is an important feature of a utility’s reliability. Mathematically, this is represented by:

$$ASAI = \frac{\text{Customer Hours Service Availability}}{\text{Customer Hours Service Demand}}$$

The above reliability indices may be computed on any time basis - daily, weekly, monthly or yearly. The Commission reviews and monitors submitted reports from the BL&P on a quarterly basis, broken down by month. An assessment of reliability performance allows the Commission to determine whether there was an improvement or deterioration in the system-wide delivery of electricity. Table 4 shows the BL&P’s reliability performance over the period 2018 – 2020.

The analysis shows that customer interruption duration (SAIDI - Hours per customer) was satisfactory, compared to the benchmark of 3.68 hours. The annual average based on the statistics for April 2018 to March 2020 was 3.21 hours per year. Outage duration for the period April 2019 to March 2020 was 19.2 minutes longer than the former period; however, this still remained 18.60 minutes better than the benchmark for outage hours per customer.

Table 4: BL&P’s Reliability Performance for the Period 2018 – 2020

SYSTEM RELIABILITY METRICS	ASSESSMENT PERIOD		
	Apr. 2018 – Mar. 2019	Apr. 2019 – Mar. 2020	Apr. – Dec. 2020
SAIDI (Hours per Customer) Benchmark 3.68	3.05	3.37	2.22
SAIFI (Outages per Customer) Benchmark 5.84	5.42	4.33	3.92
CAIDI (Hours per Affected Customer) Benchmark 0.63	0.56	0.78	0.59
ASAI (% Availability) Benchmark 99.958%	99.965%	99.962%	99.973%

Similarly, the SAIFI statistic which measures the average number of interruptions per customer, was good, when compared to the stipulated benchmark of 5.84 interruptions per year. Over the first two (2) years of the review period, April 2018 – March 2020, the frequency of outages averaged 4.875 interruptions per customer. Outages were less frequent in the second year (April 2019 – March 2020) than in the first year (April 2018 to March 2019), with a reduction of 20.11%. There were fewer observed outage occurrences per customer for the period April 2020 to December 2020, which witnessed customers experiencing 3.92 interruptions, 27.68% fewer outages than in the first year of this review period (April 2018 – March 2019). This was expected, as this was a shorter period of observation. However, the statistics associated with the frequency of outages still follows a downward trend, signalling an improvement by BL&P, as there are now fewer outages experienced per customer. In this regard a further tightening of targets can be considered. On average, a customer who experienced a power outage was out of service (CAIDI) for thirty-four (34) minutes, (0.56 hours) during the 2018 - 2019 period; compared to forty-seven (47) minutes (0.78 hours) for the second year. This suggests that restoration of service for the first year was better than the target by 4.2 minutes while for the second year, the time to restore service was longer than stipulated, by nine (9) minutes.

In terms of grid availability (ASAI), customers had access to electricity in excess of the stipulated target. The analysis shows that access to an electricity service was consistent over the review period April 2018 to December 2020, despite a major nationwide outage across November 18 and 19, 2019.

The Commission is of the view that the BL&P's performance has been commendable in relation to many of the existing targets, based on its ability to consistently surpass benchmarks established in the GES and OES over the past two (2) review periods, 2014 to December 2020. However, there remain other Standards as discussed, where the BL&P's performance requires improvement. Typically, the Commission would seek to adjust/tighten benchmarks for BL&P in an effort to encourage increased efficiency, and

to spur a continuous improvement of service quality. Similarly, the Commission may also seek to implement new metrics and standards, which reflect the needs of a dynamic domestic electricity sector; For example, such standards may be focused on ensuring there is a robust regulatory framework in place which monitors the evolving hybrid energy sector, in consideration of the Government's 2030 100% RE target.

The Commission is also aware that the COVID-19 pandemic has resulted in unprecedented levels of contraction within the domestic economy; The measured decline in economic activity, when coupled with the revolutionary changes required within the domestic electricity sector to attain targets outlined within the BNEP 2019-2030, results in a significant level of volatility and uncertainty. Against this background, the Commission is of the view that it would not be in the best interest of the sector to engage in a significant tightening of benchmarks at this time, due to the implications thereof for the BL&P. Therefore, changes to the prescribed Standards and reliability indicators will be limited primarily to those impacted by the BL&P's AMI rollout, and areas related to an improved quality of customer service interaction.

Q 8: Are the current reliability indices used to evaluate the BL&P's service delivery performance adequate? Please explain.

SECTION 5 – PROPOSED CHANGES TO BL&P STANDARDS OF SERVICE

The Commission is of the view that there is a need for adjustment(s) to be made to some of the existing Guaranteed & Overall Standards, as well as the need for the introduction of one (1) new Overall Standard. The Commission however, is also mindful that the COVID-19 pandemic has ushered in a 'new normal'. As the pandemic continues, all must endure a period of overwhelming uncertainty, rife with a myriad of challenges, economic and otherwise. The Commission recognises that the BL&P is not insulated from these challenges, and as such an effort has been made not to excessively amend or tighten Standards in a manner which may place excessive pressure or strain on the BL&P to

achieve compliance, based on the capabilities and available resources of the utility within the prevailing economic climate. Similarly, the Commission acknowledges the challenges affecting customers and is cognisant of the need to continue to balance the interests of both parties. **In this regard, the Commission through this consultation paper proposes changes to: GES 2, GES 4, GES 5, GES 7, GES 8, OES 1, OES 6 and the introduction of a new standard OES 8. If implemented, these amendments will take effect from July 1, 2021.**

5.1 CHANGES TO GUARANTEED ELECTRICITY STANDARDS (GES)

5.1.1 ADJUSTMENT TO DESCRIPTION AND MODE OF COMPENSATION UNDER GES 2

The Commission is of the view that the description of GES 2 needs to be updated, to remove any possible misinterpretation or ambiguity. The Commission also proposes that compensation under GES 2 should be applied automatically to all affected customers; effectively, this would diminish the need for manual claims, except in circumstances of a customer billing complaint (GES 8). This adjustment further incentivises the BL&P to

comply with the Standards, promptly repairing faults within the distribution system (GES 2).

Similarly, these amended measures will ensure that where there is loss, there is compensation, therefore establishing greater fairness and equity. Over the period under review several customers who were eligible failed to submit manual claims for compensation as required, and therefore were not compensated. As mentioned previously, the Commission has observed that there was a relatively low level of compliance under GES 2; Unsurprisingly, the majority of manual claims submitted to the BL&P arose from the BL&P’s failure to repair faults within the distribution system, within the stipulated 8-hour timeframe. The Commission further considers that the customer will benefit from the reduction of the administrative burden involved in submitting a manual claim. This change is intended to further enhance the efficiency of service provided to customers of the BL&P.

Table 5: Proposed changes to GES 2

Current Standard: GES 2	Proposed Standard: GES 2
<p>GES 2 Fault Repair - Distribution System</p> <p>Description: This refers to the time it takes to restore supply after fault on the distribution system (multiple customers).</p> <p>Target: Within eight (8) hours of receipt of complaint.</p> <p>Compensation: \$45.00 (D) \$90.00 (GS) \$215.00 (SVP/LP) For each additional eight (8) hours Prorated on an hourly basis</p>	<p>GES 2 Fault Repair - Distribution System</p> <p>Description: This refers to the time it takes to restore supply after a fault occurs on any part of the network that manifests itself on the distribution system (multiple customers).</p> <p>Target: Within eight (8) hours of receipt of complaint.</p> <p>Compensation: \$45.00 (D) \$90.00 (GS) \$215.00 (SVP/LP) For each additional eight (8) hours Prorated on an hourly basis</p>

Customer Initiated Claim required	Automatic Compensation
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Q 9: Do you agree with the proposed changes to the Description, and Mode of Compensation for GES 2, from customer-initiated claim (manual), to automatic compensation? Please give reasons for your answer.

5.1.2 CHANGE TO GES 4: SIMPLE SERVICE

Against the background of the BNEP 2019 – 2030, and the recently launched FIT programme, the Commission is of the view that interconnection for RE generators/IPPs (domestic, commercial and utility scale) utilising RE technologies must also be monitored closely. This monitoring is of critical importance, as the Commission anticipates a significant increase in the number of IPPs³² requiring interconnection, as Barbados moves towards its 2030 targets. Timely connection of IPPs will be an important factor in attaining the BNEP targets. Therefore, the Commission proposes to introduce GES 4 part b, which will stipulate that IPPs who submit all required documentation, be connected to the grid within thirty (30) working days.

Table 6: Proposed introduction of GES 4 (b)

³² An **independent power producer** (IPP) is an entity that is not a public utility but owns facilities to generate electric **power** for sale to utilities.

Proposed Standard: GES 4 (b)

GES 4 (b)

Interconnection of RE Generators/IPPs to BL&P grid

Description:

This refers to the time it takes to interconnect a RE generator/IPP (domestic, commercial or utility scale) after the customer signs the contract for connection, provides all required documentation, and presents a valid certificate of inspection from the Government Electrical Engineering Department (GEED).

Target: Within thirty (30) working days of receipt of all required documentation.

Compensation: Refund of installation fee (differs by class of RE Generator/IPP)

Automatic Compensation.

Q 10: Do you agree with the proposed change which includes the Interconnection of Domestic, Commercial and Utility Scale RE generators/IPPs under GES 4? Please give reasons for your answer.

5.1.3 CHANGE TO GES 5: PROVISION OF COMPLEX CONNECTION - COST ESTIMATES

In relation to GES 5, the BL&P's performance has been consistent, with BL&P achieving perfect performance (100% compliance) annually since 2014. In this regard, the Commission proposes the time frame for the provision of cost estimates to be reduced from thirty (30) working days to twenty-five (25) working days. This adjustment will ensure that BL&P seeks to continually improve its service quality wherever possible. In its review, the Commission has taken the opportunity to review the standards applied by other electricity regulators in the global arena, and we have noted that in relation to this particular parameter, other jurisdictions require the provision of cost estimates in as few as fifteen (15) or even five (5) days, based on the technical details³³. It is also noted that in

³³ Electricity North West "Metered Connections Guaranteed Standards of Service for Electricity Distribution Companies in England, Wales & Scotland, May 2020" accessed March 26, 2021, <https://www.enwl.co.uk/globalassets/get-connected/apply-for-a-new-connection/gsop/metered-connections-guaranteed-standards-of-service-for-electricity-distribution-companies-in-england-wales-and-scotland--may-2020.pdf>

the UK, a penalty structure exists for the provision of inaccurate cost estimates; this is an area which the Commission may explore further in the future.

The Commission also proposes that compensation under GES 5 be processed automatically. This will assist in the reduction of the administrative burden on customers, while further incentivising BL&P’s compliance with the Standard.

Table 7: Proposed change to GES 5

Current Standard: GES 5	Proposed Standard: GES 5
<p>Complex Connection - Cost Estimate</p> <p>Description: This refers to the time it takes to provide a cost estimate for a complex connection requiring a service visit from the time of provision of all the requisite information.</p> <p>Target: Within thirty (30) workings days of receipt of request.</p> <p>Compensation: \$45.00 (D) \$90.00 (GS) \$215.00 (SVP/LP)</p> <p>Customer Initiated Claim required</p>	<p>Complex Connection - Cost Estimate</p> <p>Description: This refers to the time it takes to provide a cost estimate for a complex connection requiring a service visit from the time of provision of all the requisite information.</p> <p>Target: Within twenty-five (25) workings days of receipt of request.</p> <p>Compensation: \$45.00 (D) \$90.00 (GS) \$215.00 (SVP/LP)</p> <p>Automatic Compensation</p>

Q 11: Do you agree with the proposed change in mode of compensation from customer-initiated claim to automatic compensation for GES 5? Further, do you agree with the proposed change in timeframe from thirty (30) to twenty-five (25) working days for the provision of cost estimates for Complex Connections? Please provide details of your reasoning.

5.1.4 CHANGE TO GES 7: TIMEFRAME FOR RECONNECTION

Against the background of consistent compliance under GES 7 from 2014 to present, as well as in light of significant progress with the BL&P’s AMI rollout, the Commission is of the view that customers should now be reconnected almost immediately, upon the verification of settlement of outstanding bills. As such, the Commission proposes that

where reconnection was previously required within six (6) working hours, such reconnection should now take place within two (2) working hours. This tightening will ensure that customers can benefit from the full range of capabilities available as a result of the BL&P's upgrading to AMI.

Table 8: Proposed change to GES 7

Current Standard: GES 7	Proposed Standard: GES 7
<p>Reconnection</p> <p>Description: This refers to the time for reconnection of service on settling the bill after disconnection at the meter, as verified by the BL&P.</p> <p>Target: Within six (6) working hours of receipt of payment.</p>	<p>Reconnection</p> <p>Description: This refers to the time for reconnection of service on settling the bill after disconnection at the meter, as verified by the BL&P.</p> <p>Target: Customers with AMI meters should be reconnected within two (2) working hours of verification of payment. Other customers should be reconnected within six (6) working hours of verification of payment.</p> <p>Customers are required to notify the BL&P of payment, and must present a receipt number as evidence, where the payment is made at an entity other than the BL&P.</p>

Q 12: Do you agree with the proposed change in timeframe for the reconnection of customers with AMI meters who were disconnected at the meter who have settled their outstanding bills, from within six (6) working hours to within two (2) working hours under GES 7? Please offer a rationale for your position.

5.1.5 CHANGE TO GES 8 (A): RESPONSE TO BILLING COMPLAINT WHERE SITE VISIT IS REQUIRED

The Commission anticipates that as the nationwide AMI rollout nears completion, fewer billing complaints will require site visits, as the BL&P has enhanced remote meter access. As such, those billing complaints which still require a site visit can be dealt with more expeditiously. The BL&P has achieved near perfect compliance with this Standard in

both the current and previous periods of review. The Commission therefore proposes that the previous ten (10) working day period for assessment and resolution be shortened to within eight (8) working days.

Table 9: Proposed change to GES 8 (a)

Current Standard: GES 8 (a)	Proposed Standard: GES 8 (a)
<p>Response to Billing Complaints</p> <p>Description: This refers to the timeframe in which the BL&P responds to customers’ billing complaints.</p> <p>Target: (a) Where a service visit is required, provide an assessment and resolution within ten (10) working days of receipt of complain</p>	<p>Response to Billing Complaints</p> <p>Description: This refers to the timeframe in which the BL&P responds to customers’ billing complaints.</p> <p>Target: (a) Where a service visit is required, provide an assessment and resolution within eight (8) working days of receipt of complaint</p>

Q 13: Do you agree with the proposed change in timeframe for the BL&P to assess and resolve billing complaints where a site visit is required, from within ten (10) working days, to within eight (8) working days under GES 8? Please offer a rationale for your position.

5.2 CHANGES TO OVERALL ELECTRICITY STANDARDS (OES)

5.2.1 CHANGES TO OES 1: METER READING - FREQUENCY OF READING

As the BL&P has made significant progress in its rollout of the AMI Project, the Commission is of the view that this Standard should be amended as we seek to measure the performance of the BL&P against its enhanced capability, as opposed to relative to its

pre-AMI project capabilities. The AMI Project featured the nationwide installation of an integrated system of meters, that enables ‘two-way’ communication between the utility and its customers. With this system in place, interim bills are expected to be rendered obsolete, as installed meters can provide ‘real-time’ data that will assist the company in its service management, while also assisting customers in making informed choices about their energy use³⁴.

The Commission is aware that although AMI meters are more accurate, there exists the possibility for errors. In this regard, it is further proposed that a third part of this Standard is developed (part c), which discusses the verification of AMI readings and records. Customers rely upon the BL&P for the preparation of bills which ought to be accurate. As such, the Commission wishes to expand on OES 1 to ensure that there are checks and balances for the protection of consumers. See below the proposed change to OES 1.

Table 10: Proposed changes to OES 1

Current Standard: OES 1	Proposed Standard: OES 1
<p>Meter Reading</p> <p>Description: Frequency of meter reading</p> <p>Target: (a) 100% of Domestic/General Service customers’ meters to be read every two months. (b) 100% of Secondary Voltage Power and Large Power customers’ meters to be read monthly.</p>	<p>Meter Reading</p> <p>Description: Frequency of meter reading</p> <p>Target: (a) 100% of Domestic/General Service customers’ AMI meters to be read monthly. (b) 100% of Secondary Voltage Power and Large Power customers’ meters to be read monthly.</p>

³⁴ The Barbados Light & Power Company Limited, “AMI Meters Installed,”.

	<p>c) 100% of AMI meter readings to be verified monthly for all customer classes.</p>
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Q 14: Do you agree with the proposed changes to OES 1, for 100% of AMI meters across all customer classes to be read monthly, and for AMI readings across all classes of customers to be verified monthly? Please offer an explanation for your answer.

5.2.2 CHANGE TO OES 6: BILLING PERIOD

The Commission proposes that 100% of customers with AMI meters be invoiced for a maximum of thirty-one (31) days. This represents a change from the current Standard which features 95% of customers being invoiced for a maximum of thirty-three (33) days. The success of the BL&Ps nationwide AMI rollout, and BL&P’s consistent historical performance in relation to this Standard, serve as the rationale for this proposed change. It is expected that this change will result in greater billing consistency for customers. The proposed Jan 1, 2022 implementation date for the enforcement of all amendments, allows BL&P a further window to obtain a 100% rollout of AMI meters nationwide.

Table 11: Proposed changes to OES 6

Current Standard: OES 6	Proposed Standard: OES 6
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<p>Billing period</p> <p>Description: The period between two meter readings whether interim, estimated or actual.</p> <p>Target: At least 95% of customers in each billing period shall be invoiced for no more than thirty-three (33) days.</p>	<p>Billing period</p> <p>Description: The period between two meter readings whether interim, estimated or actual.</p> <p>Target: 100% of customers with AMI meters shall be invoiced for no more than thirty-one (31) days in a billing period. Other customers shall be invoiced for no more than thirty-three (33) days in a billing period.</p>
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Q 15: Do you agree with the proposed change to OES 6, for 100% of customers with AMI meters to be invoiced for a maximum of thirty-one (31) days?

5.2.3 INTRODUCTION OF NEW OVERALL ELECTRICITY STANDARD OES 8: ISSUANCE OF TECHNICIAN’S INSPECTION RECEIPT

The Commission has identified that there is a need for customers to be presented with documentation of technician visits to their premises, as it better enables customers to document their interactions with BL&P. This becomes very important where disputes arise and customers solicit the Commission’s assistance in resolving the matter. On occasions, disputes span several years and have been observed to digress into the word of the BL&P, against that of the customer. This documentation is intended to alleviate such a problem, as it provides a record for both parties in the form of a duplicate Technician’s Inspection Receipt (TIR). This receipt should be issued whenever a BL&P technician visits a customer to conduct an inspection. The Standard proposes to establish a benchmark of TIRs issued to customers in 95% of technician visits to their premises. The TIR will feature the date (of request for inspection or complaint, and the inspection date), time and reason/purpose for inspection, as well as the outcome of inspection, and the signature of both parties (technician and customer). One copy of the duplicated receipt shall remain with the customer, while the other copy remains with the technician. This receipt provides reliable evidence in the event of disputes arising between the service

provider and the customer, and allows for the ‘tracking’ of issues which may span several months or years.

It is anticipated that the introduction of this Standard will result in the BL&P having to make appointments with customers, for inspections to be completed. While this may present a challenge, the Commission is eager to explore the potential benefits which may arise from the implementation of such a Standard.

If implemented, the BL&P will be tasked with the development of the physical TIR booklet, and any relevant training of its personnel that may be required. Similarly, it would be expected that the BL&P ensure that the public be made aware of this development via the BL&P’s website and other forms of advertisement, print, radio, social media, tv etc.

Table 12: Proposed New Standard OES 8

Proposed New Standard: OES 8
<p>Technician’s Inspection Receipt</p> <p>Description: This refers to a duplicate receipt which outlines the particulars of the inspection such as: date (of request for inspection or complaint and the inspection date), time, reason/purpose of inspection as well as outcome of inspection. The receipt should be signed by both the customer and the technician, and a copy should be issued to the customer whenever a technician completes an inspection. The duplicate copy is expected to remain with the technician and BL&P, as proof of inspection.</p> <p>Target: Technician Inspection Receipts (TIRs) issued in 95% of inspections at customer’s premises.</p>

Q 16: Do you agree with the introduction of OES 8 which requires the issuance of a technician’s inspection receipt (TIR) as a new Overall Standard? Please state reasons why.

5.2.4 RETENTION OF THE BL&P 2018-2020 RELIABILITY INDICATOR TARGETS

In the Commission’s 2018-2020 decision on the BL&P’s Standards of Service, Reliability Indicator Targets were introduced in an effort to create a benchmark against which reliability could be gauged. It was noted that these measures would be based on the utility’s historical performance for the five-year period 2012-2016. Having reviewed the performance of the BL&P over the April 2018 – December 2020 period, against the established benchmarks, the Commission recommends that the Reliability Indicator Targets be maintained at current levels, as reflected in the table 6 below. This proposal is grounded in the desire to maintain realistic and attainable reliability targets for the BL&P as it seeks to further diversify its generation-mix in keeping with the BNEP 2019 – 2030 targets.

Table 13: BL&P Reliability Indicator Targets

Reliability Indicator	Target
SAIDI (Hours per year per customer)	3.68
SAIFI (Outages per year per customer)	5.84
CAIDI (Hours per year per customer)	0.63
ASAI (Percentage System Availability per year)	99.958

Q 17: Do you think the established Reliability Indicator Targets should be maintained at the current levels? Please state the reasons for your position.

SECTION 6 – GENERAL EXEMPTIONS

The Commission acknowledges that the failure to meet the Guaranteed Standards of Service may be driven by circumstances or events beyond the control of the BL&P. In these circumstances, the BL&P is under no obligation to make compensatory payments. The term used to define these events is *Force Majeure*. Black's Law Dictionary (2009) defines *Force Majeure*³⁵ as:

"An event or effect that can be neither anticipated nor controlled. The term includes both acts of nature (e.g. floods and hurricanes) and acts of people (e.g. riot, strikes and wars)."

Under the current Standards of Service framework, the following events are considered to be *Force Majeure*:

- (a) An act of war (whether declared or not), hostile invasion, act of foreign enemies, terrorism or civil disorder;
- (b) A strike or strikes and or other industrial action or blockade or embargo or any other form of civil disturbance (whether lawful or not);
- (c) Landslides, lightning, hurricanes, floods, storm, earthquake, tsunami, volcanic disturbances or any other natural disaster.
- (d) Riots;
- (e) Civil commotion;
- (f) Acts or threats of terrorism;
- (g) Insurrections;
- (h) Epidemics/pandemics;
- (i) Trade restrictions;
- (j) Inability to obtain any requisite Government permits; and
- (k) Breakdown of machinery or equipment or any other force or cause of similar nature not within the control of the BL&P and which by the exercise of diligence it is unable to avoid, prevent or mitigate.

³⁵ Bryan Garner, *Black's Law Dictionary* (United States: Thomson Reuters, 2009), 718.

6.1 OTHER EXEMPTIONS AND CONDITIONS

The Commission is cognisant that other circumstances may exist from time to time which might impede the BL&P's ability to meet the prescribed Standards of Service. In such circumstances, where a customer is dissatisfied with the BL&P's application of an exemption, that customer may seek the Commission's guidance. Thereafter, the Commission may upon review authorise the BL&P's action or require it to honour the claim. The Commission expects that reasonable consideration will be given to the customer under similar circumstances, including but not limited to the customer's obligations.

The situations which might fall into this category may include but are not limited to the following:

- (a) Inability to gain access to the customer's premises or the BL&P's facilities;
- (b) Where the customer's installation does not meet the BL&P's requirements for installation or is considered unfit for service. (The BL&P's installation requirements are published in its Information and Requirements booklet and on its website);
- (c) Where the customer or the customer's agent fails to fulfil his obligations;
- (d) Where the customer informs the BL&P in writing that he does not want further action to be taken on a matter;
- (e) Where the customer requests, in writing, that the BL&P take action at a later date than required by the Standards of Service;
- (f) Where an offence has been committed through interference with the BL&P's metering equipment;
- (g) Where the customer's electricity account remains unpaid after the BL&P has given the customer notice of its intention to disconnect the supply for non-payment;
- (h) Where the BL&P is requested by a public authority to provide emergency electricity supply to assist in emergency action and the provision of such service

restricts the connection of a customer to a specified service or the rectification of a fault or service difficulty;

- (i) Where the customer is required to pay a charge to the BL&P for connection to the service or for the use of the service and the BL&P has reasonable grounds to believe, based on the customer's prior debt service record, that the customer would be unwilling or unable to pay the charge as it becomes due;
- (j) Other unforeseeable circumstances beyond the control of the Parties against which it would have been unreasonable for the affected party to take precautions and which the affected party could not foresee by using its best efforts; and
- (k) Where there are legal constraints that may prevent the BL&P from meeting the Standards of Service.

It is proposed that these aforementioned, established, extenuating conditions be maintained.

Q 18: Should the stated exemptions be revised? What other exemptions should be added to the list? Please explain your reasons.

SECTION 7 – MONITORING & ENFORCEMENT OF STANDARDS OF SERVICE

The Commission has established a monitoring system for the Standards of Service which requires the BL&P to submit quarterly regulatory reports. These reports shall include information on:

- The number of breaches under each Guaranteed Standards of Service category;
- The actual average times taken to respond to and/or rectify issues referred to under each Guaranteed Standards of Service category;
- The level of compliance of each Overall Standard of Service category as a percentage; and
- Details of any extenuating circumstances that would have prohibited the BL&P from achieving the targets under the Overall Standards of Service.

The BL&P is required to submit to the Commission annual reports which, in addition to the information above, provide information on:

- The number of customers eligible for compensation during the reporting financial year;
- The total value of eligible compensation;
- The number of customers who actually received compensation; and
- The value of compensation remitted.

The Standards of Service reporting period begins on April 1 of the existing year and concludes on March 31 in the following year, which corresponds with the Commission's financial period.

Q 19: What recommendations would you make as it pertains to the Commission's monitoring and reporting on the Standards of Service?

The Commission reserves the right to conduct independent investigations to determine the extent to which the BL&P is meeting the Standards of Service.

7.1 ENFORCEMENT OF STANDARDS

If the BL&P fails to meet an Overall Standard of Service, particularly to the point where service is severely hampered and it appears that no reasonable effort has been made to

rectify the breach, the Commission will require an explanation from BL&P and may pursue enforcement action against BL&P depending on the reasons for the breach and any relevant surrounding circumstances.

That notwithstanding, the Commission reserves the right to make any rules, regulations and orders in respect of penalties for non-compliance of the relevant Standards of Service in accordance with Section 38 of the URA, which states the following:

“The Commission may make

- a) rules;*
- b) regulations; and*
- c) orders with respect to*
 - i) imposing penalties for non-compliance with prescribed Standards of Service; and*
 - ii) prescribing amounts referred to in section 21 for failure to provide a utility service in accordance with the Standards of Service set by the Commission.”*

7.2 PUBLIC DISCLOSURE OF INFORMATION

Information related to the level of compliance by the BL&P, with the herein prescribed Guaranteed and Overall Standards of Service, will be made available to the public on an annual basis.

7.3 PUBLIC EDUCATION

The BL&P shall make a detailed list of the approved Guaranteed and Overall Standards of Service available to its customers. This list shall include information on the service categories, target times and compensatory payments, where applicable.

The BL&P's fault reporting process will also be made known to the public and the appropriate contact numbers included.

The BL&P shall also widely publicise the means via which compensation for breaches may be sought. The Commission is of the view that this can be readily advertised on the customer's electricity bill.

SECTION 8 - CONSULTATION QUESTIONS

Q 1: Should the current target levels for the Guaranteed Standards of Service be amended?

Q 2: Is the level of compensation adequate under each of the Guaranteed Standards of Service categories?

- Q 3:** Do you agree that Customer compensation should be 'Automatic' for all breaches of the Guaranteed Electricity Standards (GES), except in circumstances of a billing complaint (GES 8)?
- Q 4:** Should the current target levels for the Overall Standards of Service be amended? Please provide details.
- Q 5:** Are there any specific changes that you would like to see made to the existing Standards of Service? Please provide details.
- Q 6:** Is there any new Guaranteed or Overall Standard of Service that you would like to see introduced? Please provide details.
- Q 7:** Is there any existing Guaranteed or Overall Standard of Service that you believe should be removed? Please provide details.
- Q 8:** Are the current reliability indices used to evaluate the BL&P's service delivery performance adequate? Please explain.
- Q 9:** Do you agree with the proposed changes to the Description and Mode of Compensation for GES 2, from customer-initiated (manual) claim to automatic compensation? Please give reasons for your answer.
- Q 10:** Do you agree with the proposed change which includes the Interconnection of Domestic, Commercial and Utility Scale RE Generators/IPP's under GES 4? Please give reasons for your answer.
- Q 11:** Do you agree with the proposed change in mode of compensation from customer-initiated claim to automatic compensation for GES 5? Further, do you agree with the proposed change in timeframe from thirty (30) to twenty-five (25)

working days for the provision of cost estimates for Complex Connections?
Please provide details of your reasoning.

Q 12: Do you agree with the proposed change in timeframe for the reconnection of customers with AMI meters who were disconnected at the meter who have settled their outstanding bills, from within six (6) working hours to within two (2) working hours under GES 7? Please offer a rationale for your position.

Q 13: Do you agree with the proposed change in timeframe for the BL&P to assess and resolve billing complaints where a site visit is required, from within ten (10) working days, to within eight (8) working days under GES 8? Please offer a rationale for your position.

Q 14: Do you agree with the proposed changes to OES 1, for 100% of AMI meters across all customer classes to be read monthly, and for AMI readings across all classes of customers to be verified monthly? Please offer an explanation for your answer.

Q 15: Do you agree with the proposed change to OES 6, for 100% of customers with AMI meters to be invoiced for a maximum of thirty-one (31) days?

Q 16: Do you agree with the proposed introduction of OES 8 which requires the issuance of a Technician's Inspection Receipt (TIR) as a new Overall Standard?

Q 17: Do you think the established Reliability Indicator Targets should be maintained at the current levels? Please explain your reasons.

Q 18: Should the stated exemptions be revised? What other exemptions should be added to the list?

Q 19: What recommendations would you make as it pertains to the Commission's monitoring and reporting on the Standards of Service?