

Discussion Request 1200			Smart Metering- Customer Change of Meter Configuration Code		
Status	Issued to Market	Priority	High	Status Date	06/09/2019

Date	Version	Reason for Change	Version Status
30/07/2019	1.0	Issued to Market	Final

Part 1 DETAIL OF DISCUSSION REQUEST / MARKET CHANGE REQUEST			
Requesting Organisation(s)	CRU	Originating Jurisdiction	RoI
Request Originator Name	Alan Keegan - CRU		
Date Raised	30/07/2019		

Classification of Request			
Jurisdictional Applicability	RoI	Jurisdictional Implementation	RoI Specific
If jurisdictional implementation is for one jurisdiction only – is the other jurisdiction required to effect any changes?	N/A	Co-Ordinated Baseline Version No.	tbc
Change Type	Schema Impacting		

Detail of Request
Reason for Request

Background – CRU View

There are three Meter Configuration Codes (MCCs) relevant to the proposed NSMP design for Version 13 of the retail electricity market schema:

- 1) MCC01- 24 hour
- 2) MCC12- Half Hour
- 3) MCC16: Day, Night, Peak

Currently, the design allows for a MCC12 customer to revert to MCC16 but, MCC12 and MCC16 customers are not enabled to revert to MCC01. This approach was decided on previously TBC by the CRU during the High-Level Design and Detailed Design stages of the project.

However, some suppliers have requested that the CRU reconsider this approach in order to allow customers the option of reverting to MCC01 from either MCC12 or MCC16. These suppliers have cited a number of reasons for this which are outlined in more detail below. Based on initial discussions, the CRU is not of the view that a change to allow customers to revert back to MCC01 is warranted in the absence of more detail. The CRU requires more information on the potential impacts on customers and also requires more information regarding the impact on systems, project timelines, resource implications, etc. to accommodate this change before approving this request.

As stated in discussions with suppliers previously, the CRU does not consider it appropriate in the absence of further details to approve this change. The rationale for the CRU's position is that customers will have the ability to move to MCC12 and MCC16 and there is nothing to prevent a supplier offering the customer a flat-rate tariff on either MCC. Further, this position is consistent with earlier CRU decisions and will attempt to assist customers on their journey to time-of-use which will ultimately deliver the overall benefits of the project.

Notwithstanding this, the CRU considers it prudent to submit this DR on behalf of the supplier in question with a view to accelerating discussions on this issue with other MPs, getting all MPs to conduct impact assessments based on this potential change and bringing about a resolution on this issue in order to provide clarity to all stakeholders going forward.

Supplier View

“The absence of a facility to revert back to MCC01 seems to be on the basis of policy interpretation and to date no technical limitations have been identified which would prevent a customer’s MCC being changed back to MCC01. However, the impacts of having the ability to revert back to MCC01 should be assessed by all Market Participants to confirm same.

In earlier iterations of the Programme it may have been considered appropriate to prevent a reversion back to MCC01 to ensure customers adopt ToU, however, to bring about customer acceptance of the Programme it’s important that customers are not forced to continue with a product they don’t consider appropriate or a level of data processing that they consider privacy intrusive.

1) Customer Choice

It’s vital that customer choice exists in the NSMP. If a customer chooses a ToU (time of use) tariff associated with a MCC12 or MCC16, they should be provided with the opportunity to change their mind and revert to their previous 24-hour tariff and associated MCC01. It would not be suitable for suppliers to be required to offer a tariff to a customer which does not align with their MCC / Settlement Profile (e.g. offer a 24-hour tariff to an MCC16 customers) because of the disjoint it introduces between a supplier’s cost base and revenue stream.

While some suppliers may choose to accept this risk it should not be common practice by design. Market design should not require suppliers to decouple cost base from revenue stream due to the market instability that this concept would introduce. Given the need to provide choice to customers in line with Smart Metering Programme policy, there is a need for customers to revert to MCC01. Also, if a customer moves into a premise where the MCC is 12 or 16, but the customer does not want to avail of a ToU, their choice is unfairly curtailed which could generate negative sentiment and a perception that smart meters result in more limited customer choice.

2) Alignment with Existing Legislative Requirements & Policy Objectives

Cooling off legislation allows customers to change their mind on a product offering up to 14 days after sign-up so the NSMP design should align to the cooling off legislative requirements that suppliers must adhere to by providing a MCC01 reversion facility. In the absence of choice, the customer will be unwilling to try out new tariff offerings resulting in a low uptake of ToU weakening the market’s ability to achieve the NSMP policy objectives.

Some customers may wish to revert to MCC01 for privacy reasons. A customer may no longer want a ToU tariff meaning that they wish to put a stop to the data processing associated with these tariffs as the data processing is no longer necessary. Customers may be entitled to stop this data processing in line with their rights set out in the General Data Protection Regulation (GDPR). The right to stop data processing is not an absolute right and there are some conditions that must be met before processing is stopped but at a minimum the Programme should be designed for a small number of cases where customers can legitimately have data processing halted. A customer’s MCC determines the level of data processing (bi-monthly read, day, night, peak bi-monthly read or half hourly data provision on a day+1 basis). To adhere to GDPR requirements and furthermore, to ensure there is public acceptance of the programme, there should be a facility to ‘opt-out’ of more granular data processing and revert to MCC01.

3) Confirmation of Policy in the Context in Current Programme Design

We understand that while this may have been the case in a previous iteration of the NSMP we believe that in the context of the policy (and customer choice), legal (GDPR) and public perception change that have happened since the initial programme design back in 2015 that customers should be enabled to move from MCC12/16 to MCC01. It’s noted that an approach to reverting back to MCC01 has not been issued in any CRU Decision Paper and therefore requires clarification and a decision by the CRU.”

Proposed Solution

Supplier View

“This DR, highlights why customer choice to revert back to an MCC01 is needed and acknowledges that the original policy context that underlay the CRU position for ESNB to not facilitate reversion to MCC01 has changed in 2018/2019.

Proposal:

ESBN has highlighted that the industry technical solution is able to facilitate a change from MCC16 or MCC12 back to MCC01. The current design includes validations in MM to prevent this change.

An impact assessment of the existing MCRs and schema must be undertaken to identify where design must change to enable the reversion from MCC16/12 to MCC01. At a high level, it is likely that change would be required to the following processes

- COS (MPD 1, 2, 3) – does the customer have the right to revert to an MCC01 during a COS? Currently smart services allows a move in the other direction (from MCC16 and MCC12).
- COLE (MPD 25)– Does a customer have the right to revert during a COLE? Currently movement of MCC (via smart data services only allows movement between MCC12 and 16 and vice versa).
- COCD (MPD 24)– this process would need to be amended to facilitate movement back to MCC01. Currently it is not possible.
- Re-connection (MPD 10) would have to allow movement back to MCC01. The design allows customer to request movement from legacy to Smart and between MCC16 and MCC12.
- MPD 35.1 will need to be amended.
- All other MPDs to be assessed to determine if change required.

This DR suggests that ESNB evaluate the best way to implement the solution that’s meets the requirements outlined in the body of the DR.”

CRU View

In terms of next steps, the CRU is firstly submitting this DR to the IGG in order to accelerate discussions on this issue.

Secondly, the CRU is requesting that MPs conduct impact assessments based on this proposed DR and revert with feedback to the RMDS. The CRU is also requesting that both the RMDS and ESNB facilitate, if requested by MPs, a roundtable / working group comprised of the relevant reps from each organisation to discuss this matter. Further, the CRU is requesting that the SMART PMO be on-hand to engage with this roundtable / working group if needed.

When all of the feedback has been submitted to the RMDS, the CRU will review the feedback from all stakeholders and consider whether it will approve this change or not.

It is proposed to amend all the following inbound message to accept the request to move from MCC12/MCC16 to MCC01

- 010
- 017
- 013
- 016

The following rejection messages should be amended to remove the rejection for requesting MCC01 where current MCC is either MCC12/MCC16

- 102R
- 101R
- 014R
- 116R
- 117R

Scope of Change

Jurisdiction	Design Documentation	Business Process	DSO Backend System Change	MP Backend System Change	Tibco	Supplier EMMA	Schema	Webforms	Extranet/NI Market Website
ROI	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
NI	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>

Co-Ordinated Baseline Market Design Documents Impacted by Request

Market Messages					
Message No.	Message Name	CoBL	ROI	NI	
010	Registration Request		Y		
013	Customer Details Change		Y		
014R	Customer Details Rejection		Y		
016	Change Of Legal Entity		Y		
017	Meter Point Status Change Request		Y		
101R	New Registration Rejection		Y		
102R	Change of Supplier Registration Rejection		Y		
116R	CoLE Rejection		Y		
117R	Meter Point Status Request Rejection		Y		

Data Definitions
No Impact

Data Codes
No Impact

Market Message Implementation Guides			
ROI	Yes/No	NI	Yes/No
Customer and Data Agreements	Y	Customer and Data Agreements	Y
Meter Registration	Y	Meter Registration	Y
Meter Works	Y	Meter Works	Y

Comments

ROI - Market Process Diagrams – MPDs	
Market Process Diagram Description	Affected
MPD 1 - Change of Supplier - NQH Metered	Y
MPD 2 - Change of Supplier - QH Metered	Y
MPD 5 - New NQH Metered Connection	Y
MPD 6 - New QH Demand Metered Connection	Y
MPD 10 - Re-energisation	Y
MPD 24 - Changes to customer details	Y
MPD 25 - Change of Legal Entity	Y

NI - Market Procedures		
Market Process Number	Market Procedure	Affected
No Impact	No Impact	No Impact

ROI Guidance Documentation		
Document	Version	Affected
No impact		No Impact

ROI Briefing Documents		
Document/Paper	Version	Affected
No impact		No Impact

User and Technical Documents			
Reference	Name	Version	Affected
No impact			No Impact

Part 2 - Performance and Data Changes	
Market Messages volume, processing etc.	
Data	
Details of Data changes e.g. cleansing	

Part 3 - ReMCoSG / CER Approval		
Approved by	ReMCoSG	CRU
Comments		