

Discussion Request 1208			Smart Metering – Default Day/Night/Peak/Bi-Monthly Reads		
Status	Issued to Market	Priority	Medium	Status Date	26/08/2020

Date	Version	Reason for Change	Version Status
26/08/2020	1.0	Issues to Market	Final

Part 1 DETAIL OF DISCUSSION REQUEST / MARKET CHANGE REQUEST			
Requesting Organisation(s)	CRU	Originating Jurisdiction	RoI
Request Originator Name	Tamas Stirling		
Date Raised	19/05/2020		

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.	No Impact
Change Type	Non-Schema Impacting		

Detail of Request
Reason for Request

Background

In relation to the National Smart Metering Programme, the CRU wishes to increase the default level of data granularity for all customers with smart meters and would like to discuss alternatives to implement this change. The reason for this request stems from the following requirements.

According to Article 11(2) of EU 2019/944 (the Electricity Directive) *“Member States shall ensure that final customers are fully informed by the suppliers of the opportunities, costs and risks of such dynamic electricity price contracts, and shall ensure that suppliers are required to provide information to the final customers accordingly, including with regard to the need to have an adequate electricity meter installed. Regulatory authorities shall monitor the market developments and assess the risks that the new products and services may entail and deal with abusive practices.”* It is the suppliers’ view that the above article provides some basis to legislate for the need of more granular default data from all customers. The rationale is that without access to more granular data prior to switching to a dynamic electricity price contract, the customer cannot be fully informed about the opportunities, costs and risks of such contracts.”

The CRU is conscious of the suppliers’ concern and is dedicated to finding a suitable solution that empowers and protects customers. However, according to Article 19(4b) of S.I. No. 426/2014 *“The CER shall ensure that the security of the smart metering systems and data communication, and the privacy of final customers, is in compliance with relevant European Union data protection and privacy legislation.”*

In order to realise the benefits of the National Smart Metering Programme the CRU would like to increase the default level of data granularity for all customers with smart meters, i.e., including those who do not wish to sign up for a smart tariff. The proposed change would allow suppliers to provide personalised information to customers before signing up for a dynamic price contract and so would allow suppliers to comply with prospective transposition of Article 11(2) of the Electricity Directive.

Proposed Solution

Two options are presented for delivery of DR1208.

The first, and ESB Networks preferred option, utilises the V.13 processes, requires no schema changes, is available from January 2021 and allows each Supplier to initiate the MCC16 change for their customers. Irrespective of whether the customer has elected to be on a Standard Smart Tariff the Supplier may request the change to MCC16.

The second option would process the SST data via a non-market “data repository” and would require a number of changes across the AMI (meter firmware, HES and MDMS), as well as development of the data repository and the protocols for data access. Option 2 is not deliverable by January 2021.

Option 1: Utilising V.13 Systems & Market Processes

1. Shortly after the smart meter is installed and the CTF proving process has been completed and the initial CTF value has been confirmed, the Supplier can request the move from MCC01 to MCC16 for each MPRN.
2. The Supplier will manage the “24-hour Customer” regarding the change of format in their bill – three register readings will appear on the bill instead of one – we assume the Supplier can apply the same price to all three registers to replicate the 24-hour tariff.
3. The MCC16 Register Readings will be provided bi-monthly to Suppliers on the existing meter reading calendar (it will not be possible to provide the readings on a monthly or weekly basis).
4. It is recommended that all MCC16 Customers are settled using a profile which replicates (as far as possible) the MCC01 Standard Profile (implemented so that it copes with the 3 register arrangement) and not the “to be approved” MCC16 Standard Profile. This is to minimise, as far as possible, any change to settlement as it is assumed the majority of smart meter customers will be on a 24-hour tariff during 2021.
5. When or if a new MCC16 Standard Profile is introduced in the future, it will be introduced for all MCC16 customers.
6. **DUoS Impact:** No changes will be made to the agreed V.13 DUoS Billing process but it is recommended that the 24Hr DUoS rate is applied to all MCC16 customers (and not the “to be approved” MCC16 D/N DUoS rates). This is to avoid any change in costs being introduced to customers who are still on a flat 24-hour tariff during 2021.

A final important point on this option, Suppliers will need a lawful basis for requesting the three SST registers while the customer remains on a flat tariff.

Option 2: Non Market

This option requires a change to the MCC01 Data Push profile on the Smart Meter to include the three SST registers along with the 24-hour register and accept these into the MDMS. The 24-hour register would be processed as normal to SAP for Billing and Settlement Processes. The SST Registers would be exported from the MDMS to the “data repository” for delivery to Suppliers on a fixed date every two months.

There would be no change to the Billing & Settlement processes. MCC01 customers would be settled on the MCC01 Standard Profile and 24Hr DUoS rate, and, MCC16 customers would be settled on the “to be approved” MCC16 Standard Profile and MCC16 D/N DUoS rates.

This option would require significant development effort:

1. The meter firmware must be modified to accept a new MCC01 Data Service Push Setup which involves pushing the SST Register Snapshots along with the 24-hour import register.

2. The HES must be modified to deliver the revised MCC01 Data Push configuration to the meter and to process the additional register readings returned.
3. The MDMS must be modified to accept the three SST registers for meters which are operating on the MCC01 Data Service.
4. Assuming that the SST data can be collected into the MDMS, there is still the need to export the data from the MDMS to a “data repository” and provide a mechanism for getting it to the correct supplier on a bi-monthly basis. This would require ESB Networks application development and provision of a new data service to Suppliers.
5. We assume there would also be significant development effort required by Suppliers to implement this.

Given the scale of effort required, and that V.13 IPT is a little over 12 weeks away, this is not a practical option for January 2021 and our preliminary view is that this would be a 2022 deliverable.

A final important point on this option, a lawful basis for processing the three SST registers while the customer remains on a flat tariff will need to be established for both Suppliers & ESB Networks.

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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input 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
No Impact	No Impact	No Impact	No Impact	No Impact

Data Definitions

No Impact

Data Codes

No Impact at present

Market Message Implementation Guides

ROI	Yes/No	NI	Yes/No
No Impact	Yes	No Impact	Yes

Comments

ROI - Market Process Diagrams – MPDs		
Market Process Diagram Number	Market Process Diagram Description	Affected
None	None	None

NI - Market Procedures			
Market Procedure	Affected		
No Impact	No Impact		

ROI Guidance Documentation			
Document	Version	Affected	
No impact		No Impact	

RoI Briefing Document			
Briefing Document	Affected		
No Impact	Y		

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	CER
Comments		