

<b>Discussion Request 1208</b>			<b>Smart Metering – Default Day/Night/Peak/Bi-Monthly Reads</b>		
<b>Status</b>	Approved	<b>Priority</b>	Medium	<b>Status Date</b>	30/09/2020

Date	Version	Reason for Change	Version Status
26/08/2020	1.0	Issues to Market	Final
16/09/2020	1.1	Expand reason for request, remove Option 1 details	Final
23/09/2020	1.2	Expansion of solution	Final

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

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

Detail of Request
<b>Reason for Request</b>

## 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 to include day/night/peak register reads bimonthly. The objective is to provide more granular information to suppliers to enable them to offer Time-of-Use tariffs to their customers based on day/night/peak registers rather than 24hr registers. The request would only impact smart meter data flows, the decision to switch to a Time-of-Use tariff would remain with the customer. The context for this request is the following:

In 2015, the CRU published a Decision Paper (CER/15/270) on “Rolling out New Services: Time-of-Use Tariffs”. This paper requires suppliers to offer a Time-of-Use tariff to customers. It also notes that for some customers making a decision to move to a ToU tariff “might mean a process of education, support and familiarisation and the option to take up a Time-of-Use Tariff”, CRU considers that providing more granular information will better enable suppliers to reach these customers.

In 2019, the CRU published a Decision Paper (CRU19019) on “The Customer-Led Transition to Time-of-Use”. This paper provides more prescriptive detail on the form of the Standard Smart Tariff suppliers are required to offer to customers. This paper notes that “getting good, accurate information to electricity customers may assist them in making better choices regarding their energy needs”. In that context the CRU considers that the day/night/peak bimonthly data flow may be helpful in supporting customers in switching to a Time-of-Use tariff.

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.” 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.”*

The CRU is conscious of the suppliers’ concern and is dedicated to finding a suitable solution that empowers and protects customers and the CRU understands that day/night/peak bimonthly may not be enough for suppliers to provide personalized information to prospective interval customers. The CRU would like to clarify that the data granularity that this DR could deliver is not considered a ‘final solution’. The proposal should be viewed as an interim solution primarily focused on increasing the level of uptake of the SST. Firmer legislative basis to set the rules on access to smart metering data is expected to be delivered via the transposition of the Clean Energy Package.

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### 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.

During discussions at the IGG suppliers stated their preference for Option 2 and so Option 1 was removed from the proposal.

#### **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 is likely to require significant legislative, regulatory, business process and technical development effort:

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#### **Statutory and Regulatory Changes**

The legislative basis may need to be strengthened for ESNB to store complementary information on historical consumption. Furthermore, new rules and processes may be required for accessing smart meter data and these rules and processes may have to be approved by the CRU.

**NSMP Programme and Scope Changes to Blueprint**

It is necessary to include a set of new deliverables into NSMP Programme Phase 2 Blueprint and include DR 1208 into this set.

**New Business and Technical Design**

ESB Networks have been proceeding with technical design work on this proposal.

1. New Business process Designs will have to be developed within the New Smart Metering Code Framework to support this direction.
2. The meter firmware must be modified to accept a new MCC01 Data Service Push Setup which involves pushing the SST Register Snapshots (and other channels) along with the 24-hour import register.
3. The HES must be modified to deliver the new data push configuration to the meter and to process the additional register readings returned.
4. The MDMS must be modified and expanded to accept these new channels and registers.
5. Assuming that the data can be collected into the MDMS, there is still the need to export the data from the MDMS to a "Smart Meter data repository" and provide a mechanism for getting it to the correct supplier at an agreed frequency. The Smart meter Data repository will have to be designed and sized for other Use Cases than that identified in this proposal. This would require ESB Networks application development and provision of a new data service to Suppliers.
6. ESNB assume there would also be significant development effort required by Suppliers to implement this.

Given the scale of effort required and other interdependencies, this would be a Phase 2 deliverable.

**Scope of Change**

Jurisdiction	Design Documentation	Business Process	DSO Backend System Change	MP Backend System Change	Tibco	Supplier EIMMA	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
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Data Codes
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No Impact at present
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Market Message Implementation Guides			
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ROI	Yes/No	NI	Yes/No
No Impact	Yes	No Impact	Yes

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

NI - Market Procedures			
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Market Procedure	Affected		
No Impact	No Impact		

ROI Guidance Documentation			
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Document	Version	Affected	
No impact		No Impact	

RoI Briefing Document			
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Briefing Document	Affected		
No Impact	Y		

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

Part 2 - Performance and Data Changes	
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Market Messages volume, processing etc.	
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Data
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<b>Details of Data changes e.g. cleansing</b>	
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<b>Part 3 - ReMCoSG / CER Approval</b>		
<b>Approved by</b>	<b>ReMCoSG</b>	<b>CER</b>
<b>Comments</b>		