

# IGG Meeting Minutes

<b>Date:</b>	23 <sup>rd</sup> June 2021	<b>Time &amp; Location</b>	10:30 Conference Call
<b>Chair:</b>	Lisa Fahy, CRU		
<b>Attendees:</b>	<b>Name</b>	<b>Location</b>	
	Lindsay Sharpe, Alice Mooney, Catherine Keane, Patrick Moran	RMDS	
	Meabh Gallagher, Niki Michael	CRU	
	Carl Murphy, Siobhan Melvin, Alan Keegan, Catherine Leen, Emer Corcoran	ESBN	
	Jim Long	MRSO	
	Simon Fox-Mella	Gemserv	
	Daniel Michalowski	Glow Power	
	Jennie Dockrell	Flogas	
	Eoin McGurk	BGE	
	Aaron Currie	SSE	
	Caoimhe McWeeney, Cian Fitzgerald, Imelda McCoy, Lauren Scott	Energia	
	Alan Reynolds, Ian Grant	Panda Power	
	Donovan Sheridan	Prepaypower	
	Jessica Gregory	Community Power	
	Aine Dorrán, Susan Whyte, Mark Phelan	Electric Ireland	
	Jessica Gregory	Iberdrola	
Lesley Robinson	Bright		
Peter Brett	Ecopower		
<b>Apologies:</b>			
<b>Version Number</b>	1.0		
<b>Status</b>			

<b>Agenda:</b>	
1.	General
2.	Actions from Previous IGGs/Conference Calls
3.	New IGG Actions
4.	CRU Update
5.	De-harmonisation Update
6.	Retail Market Design Update
7.	MRSO Update
8.	ESBN Update
9.	Gemserv Update

10.	Notice Board Planned Maintenance, Reminders from IGG, etc.
11.	AOB

<p><b>1 – General</b></p> <p>L Fahy enquired if everyone was happy to sign off on v1.0 of the Conference Call minutes on 26<sup>th</sup> May 2021.</p> <p><b>Minutes Approved.</b></p>
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<p><b>2. Actions – Previous Conference Call &amp; IGG</b></p> <p>L Sharpe provided the Action Item Update.</p> <p>1 IGG action was closed since the last IGG Meeting (not including this current IGG meeting).</p> <p>1 IGG action has been carried forward.</p>
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**Action Items**

1145	<b>Brexit – MPs to review the supplementary measures on Brexit as laid out by the European Data Protection Board</b>		
<b>Update for IGG</b>	▪ L Sharpe reported that there is no further update on this action.		
<b>Discussion at IGG</b>	▪ Action to remain open.		
<b>Forum Logged: CC</b>	<b>Assigned to:</b> MPs	<b>Status:</b> Action remains <b>Open</b>	<b>Due Date:</b> 21.07.2021

<p><b>3. Actions – New IGG Actions</b></p> <p>1 new action was logged at the IGG.</p>
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1147	<b>Supplier Categorisation for new entrants – RMDS to look into the categorisation for new Suppliers entering the Retail Market.</b>		
<b>Discussion at IGG</b>	▪ See Section 6 Retail Market Design Update for details.		
<b>Forum Logged: IGG</b>	<b>Assigned to:</b> RMDS	<b>Status:</b> <b>NEW</b> Action	<b>Due Date:</b> 21.07.2021

#### 4. CRU Update

N Michael gave the following CRU update:

- Supplier Handbook – CRU published a consultation Paper on the review of the Electricity and Gas Supplier Handbook on 11.06.2021. The review focuses on changes relating to the Clean Energy Package incorporating general clarifications and issues identified by CRU. The deadline for responses is 23.07.2021.
- Non-Payment of Account Disconnections – CRU published an Information Paper on this matter this week which includes an update on any disconnections until the end of April.
- Smart PAYG Consultation Paper – CRU is currently reviewing the responses it received on the Consultation. CRU is hoping to publish a decision by the end of July.

A Dorran asked in relation to the Supplier Handbook Consultation, if CRU has a timeline when it wants to have those changes implemented.

L Fahy replied that is a good question. CRU had thought about it and what it might do is to roll them in with the Smart PAYG implementation timelines so MPs are not doing two whole suite of changes with different implementation dates probably in the same year and probably only a couple of months apart. If there is feedback from Suppliers as to what the implementation date should be, Suppliers should include it in their response to CRU.

A Dorran said that makes sense.

J Gregory stated that there is nothing specific to Smart PAYG in this review as the policy is not there yet, is CRU saying that there is going to be a Supplier Handbook review this year with changes potentially only due at the end of phase 2, and an additional Supplier Handbook update next year which will presumably cover any PAYG Supplier Handbook changes?

L Fahy replied no. The Smart PAYG decision will issue hopefully by the end of July. CRU is then planning to go out almost immediately with the Code of Practice for Smart PAYG which will be encompassed in the Supplier Handbook, so there will be a second review of the Supplier Handbook this year but just for Smart PAYG. The plan is to issue that at the end of August/start of September. It will be out for four weeks and CRU will hopefully publish the finalised Code of Practice at the end of October so that everyone will know what's expected of them. At that point, CRU will have an implementation timeline there. The last time the Supplier Handbook changes were made prior to v13.00.00, CRU gave a year, twelve months plus two, from October to October so it will be at least that again to implement the changes. There won't be an additional Supplier Handbook review next year. CRU will do two reviews this year to give full clarity and then move on again.

J Gregory said that makes sense and it would be really useful to get the detail on the timeline of the reviews. Some of the proposals in the latest Supplier Handbook changes are absolutely welcome. However, she has concerns that they will only be delivered at the end of Phase 2, e.g. around the EAB calculation. It is quite difficult to separate that out from delivery. She is not sure if there will be different timelines for different elements of the points that were raised in the Supplier Handbook.

L Fahy replied that CRU wouldn't be against a separate implementation timeline for something like the EAB. If MPs feel like that would be a good idea, they should put it in their response and CRU will take it on board. There are changes in there that are kind of wholesale and may be a big switch away from how a Supplier might do their business, some elements that need to be on the bill for example which might need a system change. If it's more of an operational thing like the EAB calculation, maybe there's more merit in

doing it a little bit earlier.

### Microgeneration

E McGurk asked if there is any update on Microgeneration and how the DR is progressing.

M Gallagher replied that CRU received a good bit of feedback on the draft DR. She thanked MPs for submitting their feedback on this. At the moment, CRU is having a number of sessions with ESBN and going through the feedback in detail. There are a lot of queries on the detail in the DR around the policy aspects that we are awaiting clarity on. CRU is trying to apportion out all the comments and get a handle of what areas of policy uncertainty it needs clarity on now in order to progress to an MCR or a further draft of the DR. CRU is engaging with the Department on this also. There is a little bit more engagement needed before CRU will be able to move to the next stage with the IGG Working Group. On the Microgeneration Support Scheme, a Senior Steering Group meeting is taking place later today and the Department is planning on giving an update on the Microgeneration Support Scheme. Hopefully CRU will have some further information on that aspect later today. There is no date planned for another IGG Microgeneration Working Group meeting at the moment, but CRU is actively considering feedback and engaging with stakeholders on the next steps. CRU hopes to have another IGG Working Group meeting scheduled in the coming weeks.

E McGurk added that any further information that CRU could give MPs on policy certainty as soon as possible would be welcome.

J Gregory reported that the timelines that were proposed in the initial DR draft that ESBN had suggested that could in theory be available in October, which is obviously very difficult for it to commit to based on not having certainty and we've not had another meeting since that was first muted. Can we as an industry assume that October is no longer a viable date for potentially receiving data?

M Gallagher stated that to give context as to where the October date was coming from, this was coming from CRU's response to the Department's Consultation on the Microgeneration Support Scheme which CRU shared with MPs. That October date was coming from an assumed mid-April date for a decision on the scheme and following that the scheme would potentially be open for applicants from 1<sup>st</sup> July. Payments would then commence from October. As the April and July steps leading up to the October date have not happened, that timeline is not feasible at this point. CRU is looking at putting together a new proposed timeline that could potentially work.

J Gregory said that's good to know. The other thing in terms of the 1<sup>st</sup> July, we may as well address the elephant in the room. The obligation is there from the 1<sup>st</sup> July but it's obviously not going to be possible, is CRU ok with that?

L Fahy replied that compliance with European legislation is a member state issue so if the Department hasn't transposed the legislation, CRU can only work within the bounds of what it has. Is CRU happy with it, no, is it the reality, yes. The Department is the body that MPs should take this up with.

J Gregory added that realistically we may as well say that no one is going to be ready for July 1<sup>st</sup>. MPs are all waiting for when that new date will be from Suppliers' perspective because MPs are all at the coal face having to deliver it.

### Communications

J Gregory reported that she was going to raise a matter in AOB in terms of communications of certain items. She has already sent CRU a couple of mails on this matter. She has a concern which she would

like minuted, around the fairness of the communication of information. For the SSG which is meeting today, the slides were distributed to the Reps which go to the EAI which is fine. But the industry is a lot bigger than the EAI. What she is proposing is that all communications go to the elected Supplier Rep so that the EAI is not the only source of information provision. A Dorran is the current Supplier Rep. Can we make sure that Suppliers can actually receive the information, not only those that are part of EAI?

L Fahy replied that this is something for the Smart Metering Programme and not really the IGG. She noted the request and has J Gregory's mail in front of her. CRU will take a look at this matter. It's not intentional in case there is any view out there that's it's happening that way. It's just a matter of the existing governance arrangements and the way that the information is shared to Reps. She appreciates that the market has moved on and that there are different players and different representatives.

S Whyte added that Derek Scully is the current Rep at the SSG, and Gillian Kinsella will be the next Rep. The role rotates, and it is BGE's turn next.

L Sharpe added that she knows that J Gregory asked RMDS this morning before the meeting about the Supplier Rep, A Dorran is the Supplier Rep for the ReMCoSG, for the co-ordinated market. The Smart Steering Group is obviously a separate forum with separate Reps.

J Gregory reported that the point is, for any Supplier Rep, is that industry gets information from wherever. Forget about it being Smart specific or whatever, we are talking about the retail industry here. There are a number of different working groups and a number of different Reps to sit on different forums. What she is suggesting is that we have an elected Supplier Rep and if that is A Dorran, it was S Doolin previously. If there are any other working groups, and she knows that the Rep for the SSG is on a rotational basis, that they also inform to the industry Supplier Rep. She knows that's how it used to work. She is suggesting that we maybe beef up our view on how the process works around the Supplier Rep to make sure that there is fairness and transparency for all MPs.

L Fahy replied that she thinks that's valid. She asked that J Gregory leaves it with her, and she will see what she can do. We might set up a mailing list and send everything to it.

A Dorran asked if this is going to be discussed further, that she could be included in the discussion.

## 5. De-harmonisation Update

L Fahy reported that CRU approved the Participant Questionnaires that went out for market assurance for the System Separation project. CRU gave its approval to Gemserv at the start of this week.

*(An update on system separation was given by NIE Networks at the ReMCoWG which followed this forum).*

## 6. Retail Market Design Update

L Sharpe gave the Retail Market Design Update.

**Refer to slides for full details.**

### **MCR1209 – Annual Consumption for HH Sites**

L Sharpe reported that RMDS issued a re-versioned MCR to MPs. It came up at the Prioritisation Workshop and subsequently some extra text has been added to the MCR.

**Refer to slide for details.**

L Sharpe sought approval for the re-versioned MCR.

**MCR12109 v3.0 approved.**

### **DR1212 - Cooling Off Period for MCC Changes**

L Sharpe reported that this DR was discussed at the IGG Conference Call. CRU laid out its position in that they were minded to reject DR1212 at this meeting. She asked CRU if its position has changed or if it is rejecting DR1212 today.

M Gallagher added that CRU is rejecting DR1212 today. CRU had subsequent engagement with a Supplier on its position since the last IGG, specifically around that Supplier's concerns that holding the Market Message would not align with the Cooling Off requirements. CRU's position remains the same in that it is satisfied that the cooling off period can be managed by Suppliers submitted the Market Message after the time period has elapsed. If any Customers who are objecting to this, Suppliers are free to pass those complaints onto CRU.

### **Retail Market Prioritisation Process**

L Sharpe reported that a prioritisation workshop took place on 02.06.2021. She thanked Suppliers for attending the workshop.

At the workshop, MPs reviewed all the open MCRs on the MCR register. Along with the two Smart MCRs, five MCRs were selected to go to the next stage of prioritisation which is for ESNB to impact assess them and work with CRU to propose package options for delivery. There was also an opportunity for MPs to rank the five MCRs that were going through in order of their priority. Thanks to everyone who responded. RMDS received eleven responses. RMDS issued the rankings to MPs on Monday.

L Sharpe outlined a summary of the rankings of the five MCRs.

**Refer to slides for details.**

RMDS passed the rankings onto ESNB and CRU as part of their assessment when they are looking at the proposed packages. Obviously, the next step will be reliant on the two Smart MCRs. We won't be able to look at packages until we know the full scope of those two MCRs and what is possible. She doesn't have timings on the next stage, but she knows that ESNB is looking at impact assessing those MCRs to put packages together once we have the two Smart MCRs.

E McGurk stated that he is not sure what the process is for updating the Prioritisation Process document. He thinks requiring Suppliers to rank the MCRs is really valuable and that should be a formal part of the process every time it is ran.

L Sharpe replied that is a good point. This was the second time that MPs used the Prioritisation Process document. Obviously, the last time, there was only one package, so MPs didn't get the full use of using the process document. Any learnings from this process can be used and looked into. It is actually good timing because RMDS will be updating the Prioritisation Process document to remove all references to the co-ordinated market, in order to make it an ROI only document post System Separation in September. Any feedback or learnings for the process can probably be incorporated into the revised version for a ROI market.

S Melvin added that she wants to make it clear that the ranking received from MPs is useful and ESNB will be looking at them but ultimately ESNB will be looking at the deliverability of each MCR. ESNB is looking at each MCR, looking for the estimated cost, synergies, and risks, which it set out in the Prioritisation workshop. Ultimately, it will be the deliverability, and although the ranking is useful, there is no guarantee that the top ranking MCRs will be ultimately delivered in a final package. ESNB is aiming to put forward multiple packages to allow MPs to vote on a final package. The ranking will be an input into packaged proposal but there are no guarantees.

### **V13.1 Minor Market Release**

L Sharpe reported that RMDS issued updates to the following Briefing Documents to the IGG on 16.06.2021.

- Comms Technical Feasible (CTF) – which was around clarification on the 30-day proving period.
- Summary Validation, Estimation and Substitution Rules for HH Interval Reading – updated to include scenarios where estimates will not be replaced by actuals.
- MPRN Enquiry Web Service Guide – a metadata file was embedded into the end of document to reflect the change from three characters to nine characters for the MIC.

RMDS received some questions from MPs on these documents. Hopefully RMDS has sent responses to all MPs on their queries.

L Sharpe sought approval for these Briefing documents.

### **Documents Approved.**

S Whyte reported that Electric Ireland had raised a question with RMDS about the timing for the CTF. If that process changes, that it goes to Change Control process. This was confirmed by RMDS.

L Sharpe added that RMDS will schedule a Minor Market Release, v13.1 to get them into official documentation. RMDS will communicate a suitable date for the release to MPs and usually gives a month's notice before a minor market release.

### **Assurance Documents**

L Sharpe reported that in October 2020, Gemserv completed a review of the Assurance Strategy and Assurance Processes for the Irish Retail Electricity Market documents and these updates were communicated to the market via RMDS. These documents are available on the New Entrant page on the RMDS website.

**Refer to slides to details.**

These updates included stylistic and language changes. The two main changes at the time were to remove the reference to the SoLR as being a segment that someone can apply to enter in the market as this is not the case. There was also the suggestion from Gemserv to remove generators using Market Messages as the scenario had never occurred. Following feedback, RMDS has added this back in. So, the only change now along with style changes is the removal of the SoLR segment as being one that Market Participants can apply to enter.

L Sharpe reported that RMDS will take these changes as approved and will leave this open until 30.06.2021. If RMDS doesn't hear back from MPs by 30.06.2021, it will take these documents as approved and update them on the RMDS website.

J Gregory stated that on the whole space of market entry, she wants to understand the view and get this into the agenda for future meetings, about the qualification process and the way that we designate small and large Suppliers and how that links with the technology. She deals with new entrants all the time and this is a very essential piece. The designation was done in 2005 and is a little bit outdated now. When you look at other jurisdictions and how designations are made, what we are doing is not necessarily fit for purpose. She wonders if we could open an item, she is not sure the appropriate way of doing it, it is really a question for RMDS, Gemserv and CRU as to how can get the discussion going about the designation of Supplier Entry. It may not be relevant for some Suppliers, but it is a huge issue for the retail market.

L Sharpe reported that it is a good point and is in fact something that she has recently discussed with Gemserv and CRU. MCR1185 was opened a number of years ago and was looking at the Small Supplier category and the limits on it. The MCR didn't go through at the time. She has been speaking with CRU on this recently and CRU is relooking at it now. She will look at the best way to get this back on the agenda. It is something behind the scenes that RMDS, Gemserv and CRU have been looking at. RMDS may bring it back under a new DR or reopen MCR1185.

J Gregory said it would be great to bring up a new DR or to open MCR1185.

L Sharpe reported that she will look into this. If she doesn't have an update for the next IGG, she will have a plan.

A new action was logged: **Action 1146 - Supplier Categorisation for new entrants – RMDS to look at the categorisation for new Suppliers entering the Retail Market.**

L Fahy added that there is a broader piece around CEP and Citizens Energy Communities and how these new entities in the market will be dealt with from a licensing perspective going forward, if it is licensing. She knows CRU's colleagues in the CEP Team have been looking at that in earnest as part of their own consultation piece. They are engaging and doing a mini public session this week to talk to sustainable Energy Communities and Citizens Energy Communities to understand the barriers and there may be some solutions there. She knows that L Sharpe mentioned a DR to be reraised, CRU can engage a bit more broadly internally to make sure that if it was to look at anything in the short term fix, that it aligns with what might be done in the boarder term because if it is heading to a more active consumer regulatory framework, it might take longer that six months to so. CRU will think about it in this context and is happy to engage on it.

## 7. MRSO Update

J Long gave the MRSO update.

He presented the abbreviated version of the MRSO Presentation. This version outlines Debt Flagging, Objections and any other key items that have come to light during the month. It now includes the number of Automated Debt Flagging figures (IGG Action 1023). The full standardised slide pack is available under the [Reference Section](#) on the RMDS Website and provides the status of Change of Supplier related activity in the ROI Market.

**Refer to slides** for full details.

J Long reported that on the Smart Data Services and changes, the functionality was switched on at the end of February. He is presenting figures on this and these figures will be included in the full MRSO set of slides on the RMDS website.

- The figure to date for MCC12 which is the 24-Hour Meter is 10,630.
- The figure to date for MCC16 which is the Day/Night Meter is 677.

He will also give an update every other month at the IGG Conference Call. The Hypercare Team will be leaving the stage soon. If MPs want the figures on a more frequent basis, he could issue them on a weekly or biweekly basis or alternatively, he will just provide these figures on a monthly basis. MPs should contact either himself or RMDS if they have any thoughts on this.

J Gregory said thanks for taking up the cudgel after hypercare dies down. It would be really useful to get these figures monthly. Something else that would be really useful in the initial stages of retail assessment, is the type of changes. Are we seeing 010MMs or 013MMs or are we seeing change of contacts? Are we seeing existing Customers changing or are we seeing switching in this space? She knows MRSO is giving MPs the total numbers of MCC12s and MCC16s which are great but to see whether most of these are driven through switching or through our new industry tariff change mechanism would be really useful to see. It would get us to understand how consumers are reacting to Smart. If it is possible to get the numbers broken down into those categories, that would be very useful, but she is not sure how difficult that would be for MRSO.

J Long reported that MRSO will definitely look at it. J Gregory has sent this into him previously and he has been onto the Smart Team trying to get this information. He will follow up again with the Smart Team and will provide feedback at the next IGG Conference Call.

S Whyte stated that Electric Ireland will be happy with just the monthly update on the overall figures for MCC12s and MCC16s.

## 8. ESB Networks Update

S Melvin & C Leen gave the ESNB Update.

**Refer to slides** for full details.

[ESBN Covid-19 Activities](#)

S Melvin reported that ESBN is continuing activities as per the Government guidance. If this changes, ESBN will come back to MPs.

#### NGNs Reminder

S Melvin reported that those numbers are changing at the end of the year, the 1850 numbers are being withdrawn. She reminded the remaining Suppliers to update the ESBN numbers if they publish them out to Customers, particularly the emergency number. She thanked those Suppliers who have already done that.

#### Day/Night Meters

S Melvin reported that ESBN is continuing with the Like for Like meter exchanges, with 3,500 done to date. Approximately 7,000 letters have issued to Customers, and the remaining letters will be going out in the next few weeks. If any Supplier would like an updated list of their MPRNs, they should send through the request to ESBN via RMDS.

E McGurk asked if ESBN is being contacted by many Customers after it issues out the letters?

S Melvin replied that there are some calls coming in but nothing major is being raised. The letters are generic enough but there aren't any major concerns being raised by Customers on the letters.

#### Supplier Insert (MCR1180)

S Melvin reported that MCR1180 New Registration Default Supplier was implemented in April 2019 as part of v12.00.00. An interim arrangement was put in place to align to sites with an MIC less than 30kva with the New Connection process for larger sites. Before this MCR was implemented, particularly for domestic connections, if a site was energised and the Customer hadn't selected a Supplier, the site would automatically default to the SoLR. This process change was put in in April 2019. As an interim arrangement before that, a process was put in place between March 2018 and April 2019 to include a list of licenced Suppliers in the ESBN Welcome Pack. ESBN will be removing that list in the next few weeks and run down stocks of the list going out to Customers. ESBN is making Suppliers aware of this because MCR1180 supersedes that interim arrangement. ESBN's letter will still refer for Customers to go onto the CRU website to get a list of Suppliers, it's just that ESBN won't be issuing the list.

#### V13.00.00 Smart - Communication on v13.00.00 Smart Hypercare Issue 15

C Leen gave an update on Smart Hypercare Issue 15. This relates to another query that has come in from Suppliers so ESBN wants to offer this clarification.

Over the past number of weeks, ESBN has been monitoring the crossover between a CoS with Smart MCC change and settlement, where settlement runs after the MCC change has been processed but before the CoS has completed. C Leen gave a detailed summary of the issue and findings.

#### **Refer to slides for details.**

At the end of the presentation, S Whyte asked if it is very much edge cases that we are talking about here.

C Leen replied yes. ESBN is prioritising that task of clearing anything implausible as a priority and is doing everything it can to mitigate that, but they are really the edge case.

E McGurk stated that this is the first time he has come across this issue. Is there any material impact for any one Supplier once it is corrected? Are these transient cases all resolved within a day or so, are there any cases that go on for longer?

C Leen replied that there are no cases that go on for longer than a day. They are solved once the user clears the implausible read which is a normal process.

J Gregory asked if the only option to sort this issue out is the implausible read and if there is no alternative for getting rid of this issue in the analysis ESNB has done? It will really mean going through it and understanding it from an aggregation point of view.

C Leen replied that there isn't any other way because when ESNB did the route cause analysis, it determined that this was the only blocker event which was creating this issue. Ultimately what ESNB would like to think is that as its estate of Smart Meters expands, it is going to have that assurance of better reading data through its systems that will probably inevitably clean out a lot of this issue of implausibility because it will have a cleaner consumption data reference point. Potentially the more Smart Meters we have, we will potentially have less issues with implausibility errors coming ESNB's way.

## 9. Gemserv Update

Simon Fox-Mella gave the Gemserv update.

**Refer to slides** for details.

### New Entrants

- 1 Export Only Supplier to Small Supplier Requalification – completed IPT Stage.
- 1 Large Supplier Material Change – completed.
- 2 Large Suppliers Material Change – planning stage.

### System Separation

- The Self-Assessment Outcome Report – issued to CRU. This has now been approved.
- Gemserv will issue an anonymised Self-Assessment Report which is on target to be issued to the Market on 5<sup>th</sup> July 2021.
- Gemserv will then be carrying out participant specific outcomes.

## 10. Notice Board: Planned Maintenance, Reminders from IGG etc.

L Sharpe provided the outage update.

### Outages

- There are no outages planned for June or July as of yet.
- Full outage details are available, as usual, on the [RMDS Website Outages Page](#).

## 11. AOB

No items were raised in AOB.

### **Next Conference call:**

- IGG Conference Call Wednesday 21<sup>st</sup> July 2021.

### **Next IGG:**

- Wednesday 25<sup>th</sup> August 2021 in Dublin (subject to change).

**Retail Market Design Service**

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