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|--------------------------------|------------------|-----------------|------------------------------------|--------------------|------------|
| Discussion Request 1215 | | | MCC02 Smart Meter Exchanges | | |
| Status | Issued to Market | Priority | Medium | Status Date | 22/09/2021 |

| Date | Version | Reason for Change | Version Status |
|------------|---------|--|----------------|
| 22/09/2021 | 1.0 | Progress Solution on MCC02 Smart Meter Exchanges | Final |

| Part 1 DETAIL OF DISCUSSION REQUEST / MARKET CHANGE REQUEST | | | |
|---|--|---------------------------------|-----|
| Requesting Organisation(s) | SSE/Energia/BGE | Originating Jurisdiction | Rol |
| Request Originator Name | Amanda Mooney / Imelda McCoy / Ger Harnett | | |
| Date Raised | 03/09/2021 | | |

| Classification of Request | | | |
|--|------------------|--|--------------|
| Jurisdictional Applicability | Rol | Jurisdictional Implementation | Rol 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 | Schema Impacting | | |

| Detail of Request |
|---------------------------|
| Reason for Request |

Background

The National Smart Metering Programme (NSMP) aims to replace Ireland's existing meters with smart meters (SM) by the end of 2025. It currently operates in accordance with the ESN-Supplier 2017 agreement that addressed the replacement of 24-hour meters.

- 1) 2 basic principles were agreed (& have applied ever since), that:
 - a. A customer led approach be adopted
 - b. A like for like meter swap be employed where that does not pertain.
- 2) In 2020 an agreement to specifically address MCC02s came into place (when the MCC02 WG agreed a ToR and subsequently, that it be done via Option.4 "Suppliers request the MCC02 exchange and manage the customer").

Phase 1 delivered on the above, with MCC01 (single phase) legacy meters being exchanged for smart meters with the same MCC01 meter configuration. The like for like exchange in terms of MCC allowed for unilateral, ESN driven deployment & management. The deployment has been successful, in part, due to it not requiring a change in customer journey or any differing interventions by individual Suppliers in their customer tariffing or with their customers who have had a meter replacement. Once Phase 1 of the Smart Programme went live in March 2021, customers with a SM were able to opt for a smart tariff by engaging with their supplier who managed the tariff change/product change process and customer journey. This to date has proven to be successful, supported by the regulated primer comms to consumers to encourage smart services and more specifically, Time of Use tariff uptake.

Day/Night Meters configured as MCC02 are the second largest cohort of domestic meters in Rol and are supported by Supplier specific Day/Night Tariffs (311,616 MCC02 in DG1,2,5, as of 03.07.21). Additionally, ESN has indicated that there are some customers with Microgen capacity with a MCC02 meter.

Current ESNB proposal:

From January 2022 ESNB propose to move to a network led approach for the exchange of MCC02 (day/night) meters. ESNB propose to exchange a day/night MCC02 meter with a smart meter, set at MCC16 (Day, Night and Peak) on commissioning.

The network led ESNB deployment approach has been conditionally supported by the CRU (CRU/21/074) which indicates the following “*CRU considers that a Networks Led deployment to MCC02 (day/night) Customers should commence from January 2022 to allow sufficient time for suppliers to update the customer journey*”.

Customer and supplier concerns:

The retail market has to date, used MCC's to determine the tariff category/structures that are offered to consumers. Suppliers have historically offered 24hr rates to MCC01 customers and day/night tariffs (different day/night unit rates) to those on MCC02 configurations. This logic continues by aggregation of settlement volumes in accordance with the load profile for that class for those customers (LP2) and the DUoS structures that map to the MCC's.

Notwithstanding the expected circulation of the relevant DR detail from ESNB, this DR is based on the following:

- ESNB exchange MCC02 meter with MCC16 smart meter.
- Customer is moved from Day, Night data recording/read recording to a Day, Night, Peak read recording.
- Suppliers will be advised of a meter exchange and a MCC change along with new readings on suite of MM.

The challenge is, as a standalone body of work, this would result in a tariff change for the customer, thus changing the nature of the bi-lateral contract between customer and supplier.

The current smart tariff change process (as well as all legacy change between 24hr and D/N meters and vice versa) is driven by the customer through the supplier. See MPD 11 and V13 amended MPD24, MPD25, MPD01, MPD02, MPD10. The reason for this is the intrinsic relationship between the MCC and the tariff structure, contract and agreement that the supplier has with their customer. The customer requests a change in tariff, the supplier agrees new terms with the customer and then requests a MCC change to allow those terms to come into effect. Once the meter is changed, the new MCC and the associated read structures are sent to the supplier to be able to calculate their tariff based on the customer and supplier contract.

While the customer journey has not yet been defined, it has been suggested, by ESNB:

- That every Day/Night customer would be informed of the change happening via one or more of the existing customer engagement triggers that ESNB issue, (yet to be detailed).
- In parallel the supplier would be sent a list of their customers that have been issued the trigger.
- The expectation is that suppliers would proactively contact the customer and begin a re-contracting journey prior to the exchange taking place.

This proposal has contractual implications that interferes with the existing bi-lateral contract between the supplier and customer, it:

- Would place significant burden on suppliers to engage with all impacted customers to advise of contract term and tariff changes and seek agreement.
- May also prompt a customer to opt out of the programme through non-technical non-participation.
- Poses a risk that a customer may not receive or may not engage with the tariff or contract change communication and will have their meter exchanged without their perceived knowledge or consent.

The proposed meter exchange does not cater for a removal from the meter exchange programme, where a customer does not wish to recontract or does not engage with the process. This is a deficit that exists in

the proposal and were it not to be catered for it would interfere with the existing contract between supplier and customer. In addition, we also have concerns that the networks led replacement of MCC02 to MCC16 does not align with current policy / established practice, which offers the customer the choice to activate smart services.

Summary:

The details above are intended to reflect the level of work and impacts on customer, supplier and the integrity of the NSMP that would result from the current ESNB proposal.

Below we propose an alternative approach, whereby ESNB, as the central DSO providing data to the entire retail market, is the source of change and therefore responsible for provision of underpinning systems to facilitate a network led replacement of MCC02 meters.

Proposed Solution

Ireland has a distinct advantage compared to many other jurisdictions where multiple DSOs operate. Change at a single point or within a single system, can provide industry clarity and optimisation without every party in the industry having to undertake an array of different changes.

To allow ESNB to continue deployment as per current agreements and achieve the high level objectives of CRU/21/074, the suggestion is that the change to data issue is facilitated on ESNB system side rather than in each supplier's system. The proposal provided is at a high level with the principles designed to leave flexibility in how ESNB chooses to implement the solution. It is expected that the ESNB solution will need to be evaluated by the retail industry to ensure it can operate within all Supplier systems with minimal change required. The same solution can be leveraged to manage future meter exchanges as part of the wider MCC 2030 ESNB initiative.

1. ESNB to manage the data storage and translation from MCC16 to MCC02 as part of the deployment programme within the Central Market Systems (CMS). There are various ways this could occur to ensure compliance with DSO licence along with supporting future operations on the MPRN.
2. ESNB create a synthetic MCC where a MCC16 operates in CMS as a MCC02 (For Readings, billing, settlement).
3. ESNB to develop a process within CMS which is non schema to enable MCC02 deployment to continue as ESNB planned for Jan 2022. If schema change is required, ESNB replan for deployment in September 2023 post V14 cutover.
4. Suppliers receive data from ESNB post meter exchange in the same format as pre-exchange resulting in no tariff change, no customer re-contracting and no impact to customer journey. Synthetic MCC (MCC16 operating as MCC02) identified in both systems to allow future management of existing retail processes.

This proposed approach would allow the principle of a customer led transition to Smart Services to remain and for continuation of the customer journey, i.e. for all legacy MCC's, to be the same as that of the MCC01 journey, which has proven successful to date.

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 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

Market Message Implementation Guides

| ROI | Yes/No | NI |
|--------------------|--------|----|
| Data Processing | Yes | |
| Meter Registration | Yes | |
| | | |

Comments

| ROI - Market Process Diagrams – MPDs | | | |
|--------------------------------------|------------------|----------|--|
| Market Process Number | Market Procedure | Affected | |
| No Impact | | Yes | |

| 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 | Yes | | |

| 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 / CRU Approval | | |
|---------------------------------|---------|-----|
| Approved by | ReMCoSG | CRU |
| | | |
| Comments | | |
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