



Rules for Application of DUoS Tariff Group

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**Commercial and Customer
ESB Networks
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1.0 About this document

This document outlines the rules for applying the correct Distribution Use of System (DUoS) tariff (DUoS Group) to a customer premises or connection point.

It outlines the requirements for new connections or a new customer at an existing connection point (Change of Legal Entity) in addition to addressing specific issues concerning existing connections (section 6).

1.1 Context

The third phase of market opening is now in place. As the market prepares for full market opening in February 2005, it is necessary to clearly set out the basis for the application of the Distribution Use of System Tariff and Public Service Obligations.

1.2 Scope

This document includes the rules applying to all connection points connected to the Distribution System for DUoS group and Public Service Obligations group.

1.3 Associated Documentation

Table 1. Associated Documentation.

No.	Document Title	Reference	Source
1	Charges for Connection to the Distribution System		ESB Networks /CER website
2	Table of DUoS Charges		ESB Networks /CER website
3	Network charges for Autoproducers and CHP Producers	CER/03/237	CER
4	ESB Ongoing Service Charges		ESB Networks website
5	Proposals for New DUoS Billing System	CER/03/290	CER website
6	Competition in Public Lighting and Unmetered Connections	CER/04/046	CER website
7	PSO Invoicing and Collection Procedures	CER/03/013	CER website

2.0 Summary

2.1 The DUoS tariffs

The DUoS Tariffs (DUoS Groups) are listed in Table 2 below.

Table 2. DUoS Tariffs

DUoS Group	Description
DG1	Urban Domestic
DG2	Rural Domestic
DG3	Public Lighting
DG4	Unmetered Connections
DG5	Low Voltage Business (Non MD)
DG5a	<i>LV Exporting Autoproducers¹ (Non MD)</i>
DG5b	<i>LV Importing Autoproducers¹ (Non MD) with on-line QH interval metering²</i>
DG6	Low Voltage Business (MD)
DG6a	<i>LV Exporting Autoproducers (MD)</i>
DG6b	<i>LV Importing Autoproducers (MD) with on-line QH interval metering²</i>
DG7	Medium Voltage (Maximum Demand)
DG7a	<i>MV Exporting Autoproducers (MD)</i>
DG7b	<i>MV Importing Autoproducers (MD)</i>
DG8	38,000 Volt Looped Maximum Demand
DG8a	<i>38kV Looped Exporting Autoproducers (MD)</i>
DG8b	<i>38kV Looped Importing Autoproducers (MD)</i>
DG9	38,000 Volt Tailed (Maximum Demand)
DG9a	<i>38kV Tailed Exporting Autoproducers (MD)</i>
DG9b	<i>38kV Tailed Importing Autoproducers (MD)</i>
DG10	110,000 Volt Maximum Demand

¹ In accordance with CER Direction (Sept 2003) "Network Charges for Autoproducers and CHP Producers" (CER/03/237).

² To facilitate the netting of the kWh; Otherwise the relevant Primary DUoS Group DG5,6,7,8,9 and 10 will apply.

2.2 How the DUoS Tariffs are set.

The customer's connection agreement (or quotation) effectively sets the DUoS tariff. Since the agreement covers issues such as compliance with the Distribution Code - i.e. the way electricity is used at the connection point, the occupant of the premises (or 'user') signs the agreement. The agreement also sets out the connecting network.

The combination of the type of use, the nature of the connecting network, the MIC, the MEC and the metering installation determines the DUoS Group.

2.2.1 Demand Customers

The rules for application of DUoS Group for demand connections are summarised in the "Primary DUoS Group" column in Table 3 below.

2.2.2 Generators

The rules for application of DUoS Group for generator are summarised in the "Primary DUoS Group" column in Table 3 below.

2.2.3 Autoproducers and CHP Producers

The applicable DUoS Group for Autoproducers and CHP Producers are summarised in Table 3 below with specific metering installation requirements highlighted in Table 2 above. For clarity, DG and DGb tariffs are identical, and DGb simply signals to the customer and Supplier that the DUoS billed will be based on netted kWh as on-line interval metering is installed.

Table 3. Summary of rules for application of DUoS Group Demand Customers, Generators, Autoproducers and CHP Producers

Customer	MIC (kVA)	Connecting Network		Primary DUoS Group	Autoproducers and CHP								
		Nominal Voltage	Density or Configuration		Auto-generation or CHP Installed	Exporting or Importing	DUoS Group AP, CHP						
Domestic	0 ³ – 29	Low Voltage	Urban	DG1									
			Rural	DG2									
Business	0 - 2 ⁴	Low Voltage		DG3									
	0 - 2 ⁵			DG4									
	3 – 49			DG5							Y	Exporting	DG5a
												Importing	DG5b
				DG6 ⁶							Y	Exporting	DG6a
				DG6								Importing	DG6b
	Medium Voltage			DG7							Y	Exporting	DG7a
												Importing	DG7b
	>=50			38,000 volts	Dual Feed	DG8	Y				Exporting	DG8a	
							Importing				DG8b		
		Single Feed	DG9	Y	Exporting	DG9a							
				Importing	DG9b								
	110,000 volts		DG10										

³ Per European Standard.EN50160, the minimum capacity for new domestic connections is 12 kVA.

⁴ Public Lighting Unmetered

⁵ Unmetered

⁶ Although a customer may have an MIC less than the threshold 50kVA the customer may opt to choose the MD tariff based on their annual consumption and load data.

3.0 Guiding Principles

- 3.1** This section summarises a number of key principles underlying the application of all DUoS Tariff Groups.
1. One MPRN per Connection Point. Since there is one connection point per customer site/installation and each connection point is governed by a separate connection agreement, this means one MPRN per connection agreement.
 2. A single DUoS Group will be assigned to an MPRN.
 3. DUoS Maximum Demand (MD) Tariffs will be applied for all connections with an MIC \geq 50kVA.
 4. For DUoS MD Tariffs the MIC will be monitored on a 24 hour basis over 7 days a week.
 5. For the purposes of monitoring the MIC, the MIC will be compared against the MD on the basis of highest demand recorded,
 6. Suppliers will be invoiced for DUoS Charges for each MPRN registered to them at the time of billing. For de-energised sites, Suppliers will be charged the Standing Charge and MIC Capacity Charge particular to the DUoS Group, for three months until de-registration. The Commission will determine when this will take effect.
 7. In accordance with the Electricity Regulation Act 1999 and to facilitate full Market arrangements each customer will have a separate connection (MRPN) to the Distribution System. This structure empowers the customer to avail of the benefits of the competitive market by facilitating the choice of their electricity supply company. This removes sub-metering by developers or landlords from a market perspective.

3.2 Retrospective Application of DUoS Charges

From January 1st 2005⁷ for both new and regularised⁸ connections, in cases where under / overcharging of DUoS occurs then DSO will correct this through rebate or recovery of outstanding charges.

Where a customer / supplier makes representations to DSO on being overcharged DUoS payments then DSO will process a rebate subject to the following:

⁷ For previous registered suppliers where transactional data is available in the IT system

⁸ Regularised connections upon the successful completion of the various implementation tasks outlined in section 6.0

- DSO will investigate and validate the rebate application ⁹
- The rebate will be made to the customer's registered supplier at the time the application is made.
- Where the customer was registered with another supplier(s) during the period in question, the full refund will be made to the current registered supplier.
- Where a portion of the refund is in respect of a previous registered supplier(s), that portion of the refund will be made by the current registered supplier directly to the customer ¹⁰

4.0 Detail of Tariff Application

The terms applicable to the customer are as set out in the Charges for Connection to the Distribution System. The terms include the connection charge and DUoS regime to apply. These are summarised in Table 4 below.

Table 4 Summary of connection terms applying

Customer Type	MIC (kVA)	Terms Applying
Domestic	12 – 29	Domestic
Business	0 - 2 (Unmetered)	Business
	> 2	

This section confirms the relevant DUoS Tariff rules that apply to new connections or a new customer at an existing connection point (Change of Legal Entity) from the 1st January 2005.

4.1 Domestic Customers

A domestic customer premises is defined as any premises whose main purpose is that of a single residence and where the connection agreement is with a private individual, with an MIC up to 29KVA.

⁹ Under Section 11 of the Statute of Limitations Act 1957, any rebate will apply up to a maximum of six years from the date the application is made.

¹⁰ It will be assumed that previous Suppliers would have passed-through the DUoS Tariff applied to the customer at that particular time.

Connections with an MIC of 30kVA or greater, the appropriate Business DUoS Group and terms of connection will be applied.

Network density reflects the type of network i.e. whether 'urban' or 'rural'. In rural networks, the length of network per customer is relatively high. This means that the cost of installing maintaining and operating network per connection is higher than in areas with a higher density. The following definitions apply:

4.1.1 Urban Domestic Connections

Urban domestic connections are defined as domestic connections that are fed from three-phase overhead or underground LV network. This rule ignores the service which may be single or three phase.

4.1.2 Rural Domestic Connections

Rural domestic connections are defined as domestic connections that are fed from single phase overhead network.

4.2 Business Connections

A non-domestic customer premises is defined as any premises whose main purpose is that of carrying out a business or where the connection agreement is with a company.

All connections above 30kVA capacity are treated under the terms for Business connections.

4.2.1 Unmetered Connections / Public Lighting

Refer to publication on Public Lighting and Unmetered Connections on CER website. A combination of metered and unmetered load on the same MPRN is not permitted.

From 1st January 2005, Public Lighting connections with loads up to and including 2kVA are unmetered, loads greater than 2KVA are metered. In addition, connections to street furniture (e.g. kiosks, bus shelters) are unmetered up to and including 2kVA and loads greater than 2KVA are metered.

4.2.2 Low Voltage Business (Non Maximum Demand)

DUoS group DG5 will be applied to all LV business connections with capacity in the range 3kVA to 49kVA and private residences with MIC \geq 30kVA.

4.2.3 Low Voltage Business (Maximum Demand)

The choice of whether to apply the low voltage maximum demand tariff or the low voltage non-maximum demand tariff has previously depended on whether maximum demand metering was present.

An MIC threshold of 50 kVA for the application of the LV Business (Maximum Demand) tariffs (DG6, DG6a, DG6b) now applies.

4.2.4 Medium Voltage (Maximum Demand)

All connections at MV are classified as DG7, DG7a, DG7b with on-line interval metering installed.

4.2.5 38kV (Maximum Demand)

All connections will be designed in accordance with the Distribution Security and Planning Standards. The relevant DG8 and DG9 tariffs will be assigned in accordance with the connecting network configuration detailed in Table 3 above.

4.3 Generators

4.3.1 Generators

Generators pay 100% of connection costs and do not pay DUoS charges in respect of their exported energy. Instead they pay an annual Ongoing Service Charge (see ESB Networks website) as well as DUoS tariffs on the energy imported from the Distribution System as per the relevant DG, as specified in Table 3. These imports are for the purpose of maintaining the generation station, and not for a 'final customer'.

4.3.2 Autoproducers and CHP Producers

The main features of the direction by the CER (CER/03/237, September 2003) include:

1. Exporting Autoproducers whose MEC exceeds their MIC may apply to DSO to pay a capital sum equivalent to the terms applying to generators in order to be designated as Autoproducer MEC > MIC for the purposes of DUoS (i.e. DGa tariffs).
2. Upon acceptance of the Exporting Autoproducer status by DSO, the Exporting Autoproducers and Exporting CHP Producers will be assigned the relevant DGa specified in Table 3 above. In addition annual Ongoing Service Charges will apply. (see website www.esb.ie/esbnetworks)

3. All Autoproducers and CHP Producers (Importing and Exporting) with on-line interval metering installed will pay the relevant DGa (when $MEC > MIC$) or DGb ($MIC \geq MEC$) tariffs on the energy imported from the Distribution System based on their netted consumption measurements within each 15 minute interval (refer to section 2.2.3 above). These imports are generally for the use of this final customer
4. Importing Autoproducers and Importing CHP Producers will be assigned the relevant DG specified in Table 3 above.
5. A trading period is on a Quarter Hour basis for the purposes of DUoS charges for Autoproducers.
6. As per Clauses 23 and 24 of the Direction, the Active Power (rather than a combination of the Active and Reactive power) is the sole factor used to provide the basis for deeming the AP to be importing or exporting energy in a given trading period.
7. The gross import kW, adjusted for the power factor, will be used for the purposes of calculating the MIC surcharge.
8. The actual gross import kW and import kVar measured will be used for the purposes of calculating the Low Power Factor surcharge.
9. The import, export and netted data will be provided to Suppliers and TSO (together with the gross kWh import and gross kVARh import data) on the QH consumption (341) market message.

5.0 Public Service Obligations Group

The Public Service Obligations Levy is a charge to be paid by final customers on electricity bills in respect of public service obligations imposed on ESB by the CER as directed by the Electricity Regulation Act 1999 (Public Service Obligations) Order 2002. The obligations relate to peat and renewable energy generating stations.

5.1 Basis of the PSO charges for final customers

The amount of the charge is to be approved by CER each year. The charging mechanism is that "CER will allocate the PSO levy among the categories in proportion to each category's percentage of total system capacity".

These categories are:

- **Domestic Account Holders**
- **Small Account Holders:** being small customers who are not Domestic Account Holders having an MIC of less than thirty (30) kilovolt amperes ("kVA") e.g. small local shops.

- **Medium-Large Account Holders:** being customers with a MIC equal to or in excess of thirty (30) kVA.

This will result in a total PSO levy for each Category which will then be applied to individual account holders as follows: -

- **Domestic Account Holders:** the total Domestic Account Holder PSO levy divided by the number of Domestic Account Holders to give a standard charge per customer.
- **Small Account Holders:** the total Small Account Holder PSO levy divided by the number of Small Account Holders to give a standard charge per customer.
- **Medium-Large Account Holders:** the total Medium-Large Account Holder PSO levy divided by the sum of the network connection capacities for such account holders, to give a standard charge per kVA to be applied to each individual account holder's registered Maximum Import Capacity (MIC).

This means that there are three distinct charging regimes under the levy. The PSO charging regimes are summarised in Table 5 below.

Table 5. PSO Charging Regimes

PSO Group	Description	Charge Mechanism
PG1	Domestic	Charge per customer
PG2	Small Business	
PG3	Medium Large	Charge per kVA of MIC.

In most cases the relevant Public Service Obligations (PSO) charge can be inferred from the DUoS group. However there are important exceptions. One of these is the General Purpose DUoS tariff (DG5) where customers with an MIC over 30 kVA are treated differently from customers with an MIC lower than 30 kVA.

The concept of PSO Groups is used to denote the type of PSO charge to apply. The rules for applying the PSO Group are summarised in Table 6.

As per CER direction all customers, including Generators, Importing and Exporting Autoproducers and CHP Producers, are subject to the PSO levy.

Table 6. Summary of rules for application of PSO Group

Customer	MIC (kVA)	DUoS Group	PSO Group
Terms applying			
Domestic	12 – 29	DG1	PG1
		DG2	
Business	0 - 2 ⁴	DG3	PG3
	0 – 2 ⁵	DG4	
	3 – 29	DG5, DG5a, DG5b	PG2
	>=30		
	>=50	DG6, DG6a, DG6b	PG3
		DG7, DG7a, DG7b	
		DG8, DG8a, DG8b	
		DG9, DG9a, DG9b	
	110kV		

6.0 Implementation

Unlike retail tariffs, the applicable DUoS tariff is set by the connection agreement and does not change unless a new agreement is required.

DSO's duty of non-discrimination requires that these rules be applied equally to all connections where practicable.

The guiding principles (Section 3.0) and rules (Section 4.0) are to be applied to all new connections and CoLE from 1st January 2005. In addition it is proposed to apply these rules to existing connections where possible from the effective dates indicated below. However, practical difficulties may arise in relation to application of a number of the guiding principles and DUoS Groups rules. Some of the difficulties and the approach to their resolution are described below.

6.1 One MPRN per Connection Point per Connection Agreement

Non Standard connections which have two connection points at different voltages have evolved in a small number of sites. A separate MPRN is assigned to each connection and the customer is charged for each DUoS Group. All future connections will be in accordance with the Distribution System Security and Planning Standards.

6.2 One DUoS Group per MPRN

The rule going forward is that there is one DUoS Group per MPRN. In the past however different non-standard metering configurations have evolved. For example, there are approximately 160 DG6 sites which also have a 24 hour register. Initial analysis has shown that consumption is less than 5% of total consumption. In order to standardise these sites we propose:

1. The metered consumption is combined and charged at applicable DUoS tariff group as per table 3 (e.g. the 24hour metered consumption is treated as a day register).
2. DSO will inform the relevant Suppliers and the effective date, as agreed with CER.

There are small numbers of domestic sites with wattless metering installed, these will be standardised by removal of the wattless meter.

6.3 Application of Maximum Demand Tariffs

As stated in section 4.2.3, the DUoS MD tariff (DG6) will be applied for all new connections with an MIC \geq 50kVA from January 1st 2005.

As already agreed with CER, MFMs are being installed in all new connections with an MIC \geq 50kVA. However, there are approximately 3,800 connections with MIC \geq 50kVA currently

classified as DG5¹¹. This situation for existing connections is to be regularised in the following way:

1. Provided suitable metering is installed these connections are transferred to DG6 from an agreed date with CER.
2. A MFM installation programme is initiated for 2,000 DG5 customer installations which currently do not have MFMs installed.
3. Pending the installation of these meters, the relevant DUoS Group will be based on the type of meter installed. On completion of each site works, the customer is then transferred to DG6.
4. DSO will inform the relevant Suppliers and the effective date, as agreed with CER.
5. Prior to commencing this MFM installation, the process to recover these costs will need to be agreed with CER. An approximate cost of this programme will be in the region of €2.5 million, however further detailed costing will be required.

6.4 DUoS MD Tariffs the MIC will be monitored on a 24 hours basis over 7 days a week.

The MIC is monitored on a 24/7 basis for DG7, DG8, DG9 following the installation of the on-line profile MFMs as approved by CER.

However DG6 connections consist of a mixture of QH (i.e. on-line profile MFMs) and NQH meter installations. Taking practical considerations into account we propose that, pending the outcome of the tariff review, currently been undertaken by CER, the MD register continues to be used for monitoring MIC for DG6 Connections, i.e. it will effectively be monitored 08h00-21h00, 5 days a week.

6.5 Application of DG7 to all MV Connections

There are approx. 100 MV connections on GP tariffs. To regularise these connections the following steps will be taken:

1. Transfer these sites to the correct tariff, effective from November 1st 2004.
2. DSO will inform the relevant Suppliers and the effective date, as agreed with CER.

¹¹ Note that there are approximately 2,000 customers on DG6 where their MIC is < 50kVA, they retain the option of remaining on that DUoS tariff.

6.6 Each customer will have a separate connection (MRPN) to the Distribution System

Over the years 'landlord' accounts have evolved which incorporate one central landlord meter, connected to DSO, with the landlord's private sub-metering of his tenants. We propose to regularise these in accordance with the above rules as the opportunity arises.

6.7 Urban or Rural Network

The rules for assigning urban and rural domestic connections to urban and rural DUoS Groups are given in section 4.1 above. These rules will apply to all future new connections from January 1st 2005.

Classification of existing domestic connections was made according to the rules prevalent at that time. These connections will be gradually reclassified according to the new rules.

Appendix 1: List of Terms

Term	Definition
Autoproducer	A person who has entered into a Connection Agreement with the DSO or TSO and generates and consumes electricity in a Single Premises, or on whose behalf another person generates electricity in the Single Premises, essentially for the first person's own consumption in that Single Premises.
CHP Producer	A person who generates electricity through a Combined Heat and Power process under a licence from the Commission. This definition of a CHP Producer, unlike that of an Autoproducer, will disregard the use made by the person of the electricity generated.
Dedicated Connection Asset	Electrical network (lines, cables, switchgear, etc.) used to connect a single user to the Distribution System. The connection asset is specific to the user and does not form part of the connection to any other user.
Connection Point	The point at which the customer's installation is connected to the Distribution System.
Consumption	The electrical energy (measured in kilowatt-hours - kWh) consumed in a premises.
Current Transformer (CT)	In installations where current transformers are installed, the current drawn by the customer from the Distribution System on each phase passes through the primary coil of the CT on that phase. The current flowing in the CT secondary coil is stepped down in a known ratio to the primary current. This secondary current passes through the meter current coil.
Current Transformer (CT) Meter	A meter designed for use with CTs. The meter current coil carries the CT secondary current. CT meters used by DSO have a standard rating of 5A. A range of CT ratings are used to cater for different load sizes.
Demand	The instantaneous rate of energy use (power) drawn from the Distribution System in kW. For the purposes of the voltage standard ¹² , the average demand in any ten-minute interval is relevant. In metering demand is averaged over 15-minute intervals. ('see also maximum demand')

¹² The standard applying in Ireland is EN50160 'Voltage characteristics of electricity supply by public distribution systems' 1994, CENELEC

Term	Definition
Distribution Code	An industry code approved by the CER, covering the operation, planning of and connection to the Distribution System.
Distribution System	The electric lines, plant and switch-gear used to convey electricity to final customers (excluding customers connected directly to the transmission system (grid)).
Distribution System Operator (DSO)	ESB in its licensed role as operator of the Distribution System.
Distribution Use of System tariff (DUoS).	The set of tariffs paid by suppliers to the DSO in respect of use of the distribution system for each connection point registered to them.
Disturbing load	A mains-operated electrical appliance or fitting of a type that is prone to cause disturbances to the electricity supply. E.g. welders, large electronically controlled heating loads.
Dual Feed	A dual feed is defined as two circuits feeding from the ESB Substation into the customer's premises. Designated as DG8 as 38kV Looped customers.
DUoS Group	A particular DUoS tariff.
Final Customer	A person being supplied with electricity at a single premises for consumption on those premises.
Forward Feed	Same as Normal Feeding (see definition below).
Generator	<p>Generation Station [Generator] a station for the generation of electricity. The generator generates electricity for export; there is no final customer on site.</p> <p>For the purposes of this document, the proposed working definition is a 'Generation User' as defined by ESBNG where there is no on-site final customer.</p> <p>A Generation User (or 'Generator') is a person or party who:</p> <ul style="list-style-type: none"> (a) ESBNG shall provide service to under Tariff Schedules GTS-T or GTS-D as identified in the tariff schedule. (b) is a party to which such schedule is applicable; and meets all the eligibility and qualification requirements or pre-requisites set out in the Transmission Use of System Agreement for Generators, and (c) has executed and maintains a valid Transmission Use of System Agreement for Generators.

Term	Definition
kVA	Kilovoltampere. (1,000 voltamperes). (The kVA value is equal to the kW value divided by the power factor)
kW	kilowatt (1,000 watts)
kWh	kilowatt-hours (1,000 watt-hours)
Maximum Demand	The maximum value of demand in a premises over a defined time, usually refers to the metered maximum demand i.e. the maximum 15-minute demand.
Maximum Import Capacity (MIC)	The maximum rate of energy use (power) to be borne by the connection as agreed between ESB and the customer (in kVA). (The MIC is on the basis of a year i.e. it is not seasonal.)
Maximum Export Capacity (MEC)	As defined in the connection agreement with DSO in MW and where the value of such (in the connection agreement for a given Connection Point/Entry Point) is expressed in MVA or kVA then such value will be converted to MW or kW by a factor of 0.95 kW/kVA.
Multifunction (MFM) Meter	An electronic meter suitable for demand measurement and the full range of DUoS tariffs.
Meter Point Reference Number (MPRN)	The number which uniquely identifies User's Metering Equipment and which is registered under the Meter Registration System as further provided in the Trading and Settlement Code.
Meter Registration System (MRS)	MRS is the system and/or process which uniquely identifies Metering Equipment and users associated with the meter and which contains pertinent data relating to the Meter as required by the Trading and Settlement Code.
Nominal Voltage	Refers to the connection voltage. The nominal voltages are as set out in the Distribution Code. In this document they are described as Low Voltage (LV), Medium Voltage (MV) and 38,000 Volts (38 kV) or 110,000 Volts (110 kV).
Normal Feeding	The network configuration under normal conditions and when all distribution plant is in service. The normal feeding arrangement is typically designed to provide best voltage performance, to minimise network losses and to make optimum use of the capacity of feeding substations is also a factor
Profile MFM Meter	An MFM meter that also stores information on the consumption profile over time. The MFM meter types currently used by used by DSO also have profile capability.
Public Service Obligations	A proposed levy to be paid by final customers on

Term	Definition
Levy (PSO)	electricity bills in respect of public service obligations imposed on ESB in relation to peat and renewable energy generating stations.
Security of Connection	The expectation that the connection point will remain energised.
Single Feed	For the purposes of setting the DG8 and DG9 tariff, a single feed is defined as one circuit feeding from the ESB Substation into the customer's premises. Designated as DG9 as 38kV Tailed customers.
Units	Usually refers to kWh (see 'kWh and 'consumption' above.)
Whole Current (WC) Meter	Meters where the current drawn by the customer from the Distribution System passes directly through the meter.