



ESNA's Response to the Consultation Paper



Appendix A: Substantive Questions

Second Consultation on Possible National Rollout Scenarios for the Smart Metering Cost Benefit Analysis

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Appendix A – List of Substantive Questions

Appendix A provides a list of questions asked throughout this consultation paper (CER/10/197 *Second Consultation on Possible National Rollout Scenarios for the Smart Metering Cost Benefit Analysis*) - these questions are presented in the table below.

The aim of this section is to allow for a “short-cut” option for respondents to submit their comments to the CER. Respondents are invited to complete the table to indicate their position on the questions being asked. Respondents should outline YES or NO answers to each of the questions listed. If they have a further comment which will clarify their answer, this should be included in the Comments box.

Please note: Respondents are in no way obliged to respond to the questionnaire provided and are welcome to submit comments in their preferred format. When preparing responses respondents should indicate which question or proposal their text refers to.

Please note also that, as the majority of questions posed in this consultation address both electricity and gas smart metering issues, respondents should make it explicit in their responses if their comments are applicable to electricity, gas or both.

Question	Yes	No	Comments
Section 2.0 - Objectives			
Q1. Respondents are invited to comment on the proposed objectives of the National Smart Meter Programme outlined in Section 2. Are you in favour of the proposals? Outline reasons for agreement or disagreement.	Yes		We believe that it is important to integrate smart metering with a smart grid strategy. Otherwise, there will be money wasted as well as the potential to install equipment that will quickly become obsolete. Combined the two will provide mutual benefits for all stakeholders.
Section 3.0 - Ownership, Display and Provision of Information			
Q2. Respondents are invited to comment on the proposed working assumptions outlined in Section 3 relating to data ownership, display and provision. Are you in favour of the proposals? Outline reasons for agreement or disagreement.	Yes		The important factor for both is flexibility since one approach may not work for all customers and suppliers. For example, access to data should be available to customers via a variety of options including web portal and in-home display, and data granularity should be remotely configurable to change as needed. Customers should have control of their data and what gets provided to suppliers, and Distribution Network Operators should also have access to data in order to operate and manage the network.
Section 4.0 - Smart Metering System Functionality			
Q3. Respondents are invited to comment on the proposed working assumptions		No	The list of required functionality is good but not complete. There should also be a requirement for

<p>outlined in Section 4.2 in relation to the smart metering functionality requirements. Are you in favour of the proposals? Outline reasons for agreement or disagreement.</p>			<p>three phase meters it include an integrated disconnect. Also, regarding the HAN, since many of the technologies are still evolving and will continue to evolve, the electricity meter should include a modular interface that allows the HAN technologies to be changed and replaced over the life of the meter. Finally, power quality data (i.e. voltage sag/swell, overcurrent) should be clearly stated as a requirement for all electricity meters.</p>
<p>Q4. Respondents are invited to comment on the proposed working assumptions outlined in Section 4.3.1.1 in relation to the Wide Area Network (WAN) functionality and technology. Are you in favour of the proposals? Outline reasons for agreement or disagreement.</p>		<p>No</p>	<p>We disagree with the conclusions regarding DLC. Not all power line technologies are the same and ESB's pilot experience with DLC is not indicative of all DLC technologies. In fact some narrowband DLC solutions have tested even better than OFDM based solution. There are many Utilities in our Association that have very positive experiences with our power line based DLC solution, which is not based on OFDM, for providing a variety of smart metering and smart grid applications including all of the functionality outlined in Section 4.2. Their collective experience includes greater than 99.7% availability of load profile interval data. In fact, we would advocate our DLC solution over any RF mesh based solution or GPRS solution for both urban and rural deployments based on proven performance, cost, and smart grid functionality. The proper DLC solution not only provides smart metering functionality but also since it is embedded within the power line, it can offer a variety of smart grid functionalities on the transformer's low side distribution network that an RF</p>

			based on GPRS solution cannot provide. DLC allows a transformer centric smart grid approach to be deployed that provides benefits for the both the utility and the customer. In addition, some DLC solutions are more cost effective and efficient than both GPRS and RF mesh solutions. We suggest that additional narrowband DLC pilots be conducted and/or visits scheduled with Utilities that are successfully using DLC based solutions.
Q5. Respondents are invited to comment on the proposed working assumptions outlined in Section 4.3.1.2 in relation to the Wide Area Network (WAN) provision and management model. Are you in favour of the proposals? Outline reasons for agreement or disagreement.	Yes		We agree that it is cost effective for electricity meters and gas meters to utilize the same WAN and infrastructure. There are many utilities across utilities that are using this proven approach.
Q6. Respondents are invited to comment on the proposed working assumptions outlined in Section 4.3.2 in relation to the Home Area Network (HAN). Are you in favour of the proposals? Outline reasons for agreement or disagreement.	Yes		We are in favour of scenario 1 only! This approach provides the most flexibility especially considering the various risks associated with selecting a HAN technology. Since expectations are that HAN technologies will continue to evolve and emerge throughout the years, the meter should provide a modular HAN interface rather than embedding the HAN technology inside of the meter. Scenario 2 would almost certainly involve how to handle obsolete technology, which would add to the overall lifetime cost of a smart metering system. Scenario 1 is more cost effective and will provide

			flexibility to change devices or technologies over the lifetime of the meter. In addition, the 2 port approach using M-Bus for interfacing with gas and other meters is a proven and cost effective solution.
Section 5.0 - Implementation			
Q7. Respondents are invited to comment on the proposed working assumptions outlined in Section 5 relating to the implementation approach and timelines. Are you in favour of the proposals? Outline reasons for agreement or disagreement.	Yes		In general, we agree with the proposed working assumptions. We believe that some of the estimated time frames will turn out to be shorter than the maximum times proposed. However it is better to be conservative with the working assumptions and then shorten the time later if appropriate.

