



CER National Smart Metering Programme
Pay As You Go
BGN Response to CER/13/165 Consultation



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1. Introduction

Bord Gáis Networks (BGN) welcomes the opportunity to respond to the consultation on “Pay as You Go”, published by the Commission for Energy Regulation (CER) on 6th September 2013.

BGN’s responses to the questions asked throughout the Consultation Paper follow in section 2 of this document.

2. BGN Responses to Consultation Questions:

The following table contains BGN's responses to the questions asked throughout the consultation paper:

2.1 Evaluation Criteria

Question / Proposal	Yes/No	Comments
Q1. Is there anything you would add or remove from these evaluation criteria?		The evaluation criteria are appropriate given that they are based on the SSM design principles. As we noted in our response to the SSM consultation paper, BGN believes that the "Irish Market Context" criterion needs to include the avoidance of the specification of proprietary requirements for the technology components of the Irish Smart Metering solution. Specifications should align with open standards and allow the selection of technology components already deployed and tested in larger international markets. This aspect is particularly relevant when considering some of the proposed solutions to the issues identified in Section 6 of this consultation paper.

Question / Proposal	Response
Q2. What are your views on the data protection approach set out above?	BGN is in agreement with the approach outlined to Data Protection.

2.2 Introduction to Pay as You Go

Guiding Principle (refer to Guiding Principles for further details)	Q3a. Do you agree that the Guiding Principles are appropriately defined?	Q3b. Do you have any further comments (or enhancements) on / to the Guiding Principles?
GP1: PAYG and Credit payment methods supported seamlessly	Yes. The smart metering system should support both Pay As You Go and Credit payment methods.	No
GP2: Access to balance information	Yes. Customers should have ready and easy access to balance information.	No
GP3: Self-disconnection warnings	Yes. Customers should receive reasonable warning of self-disconnection.	No
GP4: PAYG and Credit processes support all market processes in a similar way	Yes. Pay As You Go mode should support all market processes in a similar way to credit customers.	Detailed market rules regarding the transfer of debt upon Change of Supplier need to be developed for both the gas and electricity markets.
GP5: PAYG payment channels	Yes. Pay As You Go mode should support payment channels for customers without mobile or internet access.	Arrangements need to be developed so that customers can vend at Payment Outlets.
GP6: Debt Management during a change of supplier	Yes. Customer debt during a Change of Supplier should be managed in line with the Debt Management consultation.	Detailed market rules regarding the transfer of debt upon Change of Supplier need to be developed for both the gas and electricity markets.



Guiding Principle (refer to Guiding Principles for further details)	Q3a. Do you agree that the Guiding Principles are appropriately defined?	Q3b. Do you have any further comments (or enhancements) on / to the Guiding Principles?
GP7: The mandated IHD is not required to support PAYG	Yes. BGN agree that the mandated IHD is not required to support PAYG.	No
GP8: Disconnection and reconnection definitions	BGN generally agree with the definitions that are provided.	Self-Disconnection and Self-Reconnection will not be real time events for gas customers.

Question/ Proposal	Yes/No	Comments
Q4. If you consider that certain areas may have been overlooked in the compilation of the Guiding Principles, please provide details with suggestions and reasons for inclusions to further support the development of the PAYG solution?		BGN are in general agreement with the Guiding Principles. However it is essential that the roles of the Distribution Network Operator and Shippers are clearly defined prior to the development of detailed Market Processes.

Requirement (refer to Appendix D – Identified Requirements for further details)	Q5a. Do you agree that the requirement is appropriately defined?	Q5b. Do you have any further comments on the requirement?
PPR001: A Pay As You Go customer must be able to create a new Pay As You Go connection	This requirement is clearly defined.	No
PPR002: Credit balance must be managed during a Change of Supplier	This requirement is clearly defined.	This requirement is related to the manner in which debt is managed. Commercial arrangements between Shippers may be required for the management of Credit and Debt.
PPR003: A customer must be able to switch seamlessly between payment methods (Credit and Pay As You Go)	This requirement is clearly defined.	This will be an improvement on the current PPM offering.
PPR004: ToU tariffs must be available to all customers	This requirement is clearly defined.	No
PPR005: Pay As You Go credit transactions should occur in real-time	This requirement is clearly defined.	Self-Disconnection and Self-Reconnection events for gas customers require a number of steps which will introduce latency.
PPR006: A Pay As You Go customer must have access to their known credit balance as required to avoid disconnection	This requirement is clearly defined.	No

<p>Requirement</p> <p>(refer to Appendix D – Identified Requirements for further details)</p>	<p>Q5a.</p> <p>Do you agree that the requirement is appropriately defined?</p>	<p>Q5b.</p> <p>Do you have any further comments on the requirement?</p>
<p>PPR007: A Pay As You Go gas customer must be present at the gas meter during a reconnection event</p>	<p>BGN agrees with this requirement and believes that it is important for safe operation of gas smart-metering. This requirement is consistent with the current BGN practice. Currently gas PPM customers are required to press a sequence of buttons in response to a series of prompts on the LCD screen of the PPM meter. This serves a number of purposes:</p> <ol style="list-style-type: none"> 1. The customer is asked whether all gas appliances have been turned off before they restore the gas supply; <i>and</i> 2. It confirms that the customer is physically present when restoring the gas supply, so that even if they ignore the prompt they should still be able to smell any gas released by an unlit appliance. 	<p>BGN believes that it is important to continue to have these safeguards in a smart-world. The current process ensures the customer is present at the meter which provides an important safeguard. If remote restoration of gas supply is allowed then there would be an increased risk of an uncontrolled gas release into a building and a potential gas explosion.</p> <p>Although the technical standards allow for alternative solutions such as the detection of high-gas flow by the meter and automatic closing of the valve etc, it is unclear whether these solutions have been deployed and proven in service elsewhere. In addition any deviation from the current practice would be a material change to the BGN Safety Case and would have to be agreed with the CER.</p>

Requirement (refer to Appendix D – Identified Requirements for further details)	Q5a. Do you agree that the requirement is appropriately defined?	Q5b. Do you have any further comments on the requirement?
PPR008: A Pay As You Go customer shall be alerted when credit falls below an agreed minimum credit threshold	This requirement is clearly defined.	No
PPR009: A Pay As You Go customer shall be alerted when Emergency Credit is in use	This requirement is clearly defined.	No
PPR010: A Pay As You Go customer shall be alerted prior to a disconnection	This requirement is clearly defined.	No

Requirement (refer to Appendix D – Identified Requirements for further details)	Q5a. Do you agree that the requirement is appropriately defined?	Q5b. Do you have any further comments on the requirement?
PPR011: The system shall be capable of sending identified Pay As You Go meter event notifications to suppliers within agreed SLA's	At this stage of consultation BGN believes that identifying a requirement around request and response times for meter event notifications being governed by agreed SLA's is appropriate.	Please refer to appropriate timing and dependencies of such discussions regarding SLAs in response above to PPR017. BGN would also be interested in understanding what industry participants identify as necessary PAYG meter event notifications that need to be communicated back to Shippers/Suppliers over and above daily consumption data for PAYG customers, but do not see this detail as necessary in this phase of consultation.
PPR012: Customer debt will be transferred in Pay As You Go CoS situation	This requirement is clearly defined.	Detailed market rules regarding the transfer of customer debt in a COS situation need to be developed.

Requirement (refer to Appendix D – Identified Requirements for further details)	Q5a. Do you agree that the requirement is appropriately defined?	Q5b. Do you have any further comments on the requirement?
PPR013: A common Pay As You Go model must be used for Gas and Electricity	This requirement is clearly defined.	We agree with the clarification in the consultation paper that this requirement is subject to the application of safety and safe operation. Other factors which will influence the degree to which this requirement can be met will include consideration of any adverse cost implications of adhering to this requirement and the availability of suitable technical solutions.
PPR014: Friendly credit / disconnection periods must be applied to a customer	This requirement is clearly defined.	No
PPR015: Debt recovery arrangements must be configurable	This requirement is clearly defined.	No
PPR016: Customers should have access to all payment channels	This requirement is clearly defined.	This may not always be feasible as some customers may not have access to mobile or internet services.

<p style="text-align: center;">Requirement</p> <p style="text-align: center;">(refer to Appendix D – Identified Requirements for further details)</p>	<p style="text-align: center;">Q5a.</p> <p style="text-align: center;">Do you agree that the requirement is appropriately defined?</p>	<p style="text-align: center;">Q5b.</p> <p style="text-align: center;">Do you have any further comments on the requirement?</p>
<p>PPR017: Requests and responses from / to supplier to meter/infrastructure should be capable of happening within agreed SLA's</p>	<p>At this stage of consultation BGN believes that identifying a requirement around request and response times across the end to end smart metering solution being governed by agreed SLA's is appropriate.</p>	<p>BGN believes that industry engagement on the broad parameters of request/response SLAs should be considered in more detail through facilitated multi-party workshop discussions in 2014/2015 (BGN, ESNB, Shipper/Supplier community).</p> <p>Pre-cursors to such discussions would include the final CER decision regarding the SSM and PPM solution. In addition, any SLA related discussions must be cognisant of the technical capabilities of the overall Smart Metering Architecture. This includes the capabilities of existing gas market facing systems that are being leveraged for Smart Metering industry communications, head end system(s), the WAN communication infrastructure, the HAN communication infrastructure (and the capabilities of the selected HAN protocol), the Gas-Meter which is “awake” once every 30 minutes etc.</p> <p>Such end to end capabilities will only be understood once detailed design is complete and procurement milestones are met in 2014, and thus discussions regarding SLAs in advance of same would be speculative.</p>

Requirement (refer to Appendix D – Identified Requirements for further details)	Q5a. Do you agree that the requirement is appropriately defined?	Q5b. Do you have any further comments on the requirement?
PPR019: The system shall be capable of sending identified Pay As You Go system event notifications to suppliers within agreed SLA's	BGN agrees that identifying a requirement around sending identified and necessary PAYG system events to Shippers/Suppliers and for such messages to be governed by agreed SLA's is appropriate.	Please refer to appropriate timing and dependencies of such discussions regarding SLAs in response above to PPR017. BGN would also be interested in understanding what industry participants identify as necessary PAYG system events that need to be communicated back to Shippers/Suppliers over and above daily consumption data for PAYG customers, but do not see this detail as necessary in this phase of consultation.
PPR020: Pay As You Go credit balance will not be credited for export kWhs.	Not applicable for gas.	
PPR021: Single version of credit balance must be displayed to customers	This requirement is clearly defined.	No
PPR022: Customer debt balance shall be held on supplier systems	This requirement is clearly defined.	No



Question/ Proposal	Yes/No	Comments
Q6. Are there any requirements missing that should be included to further support the development of the PAYG solution?		BGN as the gas DSO needs to know operating mode (credit/PPM) of meter. This is very important for the efficient operations of GPRO processes. This is also important for the following reasons: Customer Care, the achievement of SLAs and Regulatory Reporting.

2.3 The Pay As You Go Customer Experience

Question/ Proposal	Yes/No	Comments
<p>Q7. Are there any fundamental (to PAYG) customer experience scenarios, existing or new, that should be outlined. Please provide details, including how it could work for SSM and AWA.</p>		<p>The scenarios outlined in Section 5 of the Consultation Paper cover a large part of the PAYG Customer Experience.</p> <p>Debt management is not included in the Customer Experience scenarios. This is an essential element of PAYG functionality.</p>

Question	Becoming a PAYG Customer (refer to The PAYG Customer Experience for further details)
<p>Q8. What are the respondents' views on the Consumer Focus aspects for the SSM and AWA solutions for the scenario?</p>	<p>Both the SSM and AWA solutions offer a much improved customer experience compared to the Present State in the case where a customer is moving to PAYG for the first time. The removal of the requirement to physically replace the meter will be of benefit to the consumer in terms of reduced delays and inconvenience in becoming a PAYG customer.</p>
<p>Q9. What are the respondents' views on the Consistency & Integrated Solution aspects for the SSM and AWA solutions for the scenario?</p>	<p>The SSM solution offers greater consistency in the meter messaging required for Credit and PAYG customers. The AWA involves an increased level of meter messaging to configure the meter on setting up the PAYG customer which would not be required in the case of a credit customer.</p>

Question	Becoming a PAYG Customer (refer to The PAYG Customer Experience for further details)
Q10. What are the respondents' views on the Scalability & Future Proofing aspects for the SSM and AWA solutions for the scenario?	The AWA solution has limited scalability in terms of dealing with more dynamic ToU tariffs which would be complex to configure on the meter. The SSM solution is more scalable in this regard as it would be simpler to deal with such tariffs through configuration of back-end Supplier billing systems.
Q11. What are the respondents' views on the Cost Efficiency aspects for the SSM and AWA solutions for the scenario?	The AWA would attract higher operational costs given the extra messaging to and from the meter which would be required in order to setup the PAYG customer.
Q12. What are the respondents' views on the Irish Market Context aspects for the SSM and AWA solutions for the scenario?	The AWA would involve a higher degree of change to existing market systems given the requirement to add new market processes to facilitate the meter configuration required as part of the process to set up a PAYG customer.
Q13. What are the respondents view on where the perceived benefits lie?	
Q14. Do the respondents' have any further comments on the proposed SSM and AWA solutions for the scenario?	

Question	Transferring from PAYG to Credit Payment Method (refer to The PAYG Customer Experience for further details)
Q8. What are the respondents' views on the Consumer Focus aspects for the SSM and AWA solutions for the scenario?	Similar to the previous scenario, the customer experience is much improved relative to the Present State given the removal of the requirement to physically replace the meter.
Q9. What are the respondents' views on the Consistency & Integrated Solution aspects for the SSM and AWA solutions for the scenario?	Similar to the previous scenario, the AWA model requires additional meter messaging to enable the final balance calculation on the meter.
Q10. What are the respondents' views on the Scalability & Future Proofing aspects for the SSM and AWA solutions for the scenario?	
Q11. What are the respondents' views on the Cost Efficiency aspects for the SSM and AWA solutions for the scenario?	The AWA would attract higher operational costs given the extra messaging to and from the meter which would be required to enable the final balance calculation on the meter.
Q12. What are the respondents' views on the Irish Market Context aspects for the SSM and AWA solutions for the scenario?	The AWA would involve a higher degree of change to existing market systems given the requirement to add new market processes to facilitate the final balance calculation on the meter.
Q13. What are the respondents view on where the perceived benefits lie?	
Q14. Do the respondents' have any further comments on the proposed SSM and AWA solutions for the scenario?	



Question	Topping up your Credit Balance (refer to The PAYG Customer Experience for further details)
Q8. What are the respondents' views on the Consumer Focus aspects for the SSM and AWA solutions for the scenario?	The SSM and AWA models should lead to a similar customer experience in that similar payment channels should be available to the customer in either model.
Q9. What are the respondents' views on the Consistency & Integrated Solution aspects for the SSM and AWA solutions for the scenario?	The SSM solution offers greater consistency in the meter messaging required for Credit and PAYG customers. The AWA model would require additional meter messaging to transmit credit top-ups to the meter for a PAYG customer.
Q10. What are the respondents' views on the Scalability & Future Proofing aspects for the SSM and AWA solutions for the scenario?	
Q11. What are the respondents' views on the Cost Efficiency aspects for the SSM and AWA solutions for the scenario?	<p>For gas PAYG, the SSM solution could lead to higher operational costs for this scenario where the top-up occurs when the customer is currently disconnected. In the event of a failure of the radio communications link between the Electricity Meter and the Gas Meter the reconnection message would not reach the gas meter, leaving the customer off-supply. Site visits, leading to additional operational costs, could be required to resolve such issues.</p> <p>On the other hand the AWA solution would lead to the adoption of a “thick” smart gas meter which typically supports the application of credit directly to the meter in the event of a communication failure, thereby avoiding a site visit.</p>



Question	Topping up your Credit Balance (refer to The PAYG Customer Experience for further details)
Q12. What are the respondents' views on the Irish Market Context aspects for the SSM and AWA solutions for the scenario?	<p>The AWA would involve a higher degree of change to existing market systems given the requirement to add new market processes to transmit top-up instructions to the meter.</p> <p>The SSM would not involve additional market messages for this customer experience scenario given that disconnect/reconnect messaging will be required for credit customers in any case.</p>
Q13. What are the respondents view on where the perceived benefits lie?	
Q14. Do the respondents' have any further comments on the proposed SSM and AWA solutions for the scenario?	

Question	Viewing your Credit Balance (refer to The PAYG Customer Experience for further details)
Q8. What are the respondents' views on the Consumer Focus aspects for the SSM and AWA solutions for the scenario?	Either model effectively involves a choice between the supplier (SSM) or the customer (AWA) having the most current knowledge of the balance position. Adoption of the SSM would require existing PAYG customers adapting to utilisation of new channels to obtain their balance position.
Q9. What are the respondents' views on the Consistency & Integrated Solution aspects for the SSM and AWA solutions for the scenario?	The AWA model would require additional meter messaging to retrieve balance positions from each PAYG meter on a daily basis.
Q10. What are the respondents' views on the Scalability & Future Proofing aspects for the SSM and AWA solutions for the scenario?	The AWA model would require complex reconciliation steps for Suppliers in resolving any differences between the balance position available at the meter and that calculated in supplier back-office systems. These issues would obviously grow in line with any growth in the PAYG customer base.
Q11. What are the respondents' views on the Cost Efficiency aspects for the SSM and AWA solutions for the scenario?	The AWA would attract higher operational costs given the extra messaging to and from the meter which would be required in order to retrieve the meter balance position and reconcile it with the back-office balance position.
Q12. What are the respondents' views on the Irish Market Context aspects for the SSM and AWA solutions for the scenario?	The AWA would involve a higher degree of change to existing market systems given the requirement to add new market processes to retrieve the meter balance position and reconcile it with the back-office balance position.
Q13. What are the respondents view on where the perceived benefits lie?	
Q14. Do the respondents' have any further comments on the proposed SSM and AWA solutions for the scenario?	



Question	Refunding your Credit when you Change Supplier (refer to The PAYG Customer Experience for further details)
Q8. What are the respondents' views on the Consumer Focus aspects for the SSM and AWA solutions for the scenario?	The SSM and AWA models should lead to a similar customer experience. The AWA model would involve more complex steps to establish final balance position. However these steps would be required to establish daily balance position in any case so it is not clear why they should lead to difficulties sufficient to restrict or reduce COS switching.
Q9. What are the respondents' views on the Consistency & Integrated Solution aspects for the SSM and AWA solutions for the scenario?	Same comment as the previous scenario ("Viewing your Credit Balance") applies given that the principal step involved in this scenario is retrieval of the credit balance to be refunded.
Q10. What are the respondents' views on the Scalability & Future Proofing aspects for the SSM and AWA solutions for the scenario?	Same comment as the previous scenario ("Viewing your Credit Balance") applies given that the principal step involved in this scenario is retrieval of the credit balance to be refunded.
Q11. What are the respondents' views on the Cost Efficiency aspects for the SSM and AWA solutions for the scenario?	Same comment as the previous scenario ("Viewing your Credit Balance") applies given that the principal step involved in this scenario is retrieval of the credit balance to be refunded.
Q12. What are the respondents' views on the Irish Market Context aspects for the SSM and AWA solutions for the scenario?	Same comment as the previous scenario ("Viewing your Credit Balance") applies given that the principal step involved in this scenario is retrieval of the credit balance to be refunded.
Q13. What are the respondents view on where the perceived benefits lie?	



Question	Refunding your Credit when you Change Supplier (refer to The PAYG Customer Experience for further details)
Q14. Do the respondents' have any further comments on the proposed SSM and AWA solutions for the scenario?	



Question	How you are Alerted when your Credit is Running Low (refer to The PAYG Customer Experience for further details)
Q8. What are the respondents' views on the Consumer Focus aspects for the SSM and AWA solutions for the scenario?	
Q9. What are the respondents' views on the Consistency & Integrated Solution aspects for the SSM and AWA solutions for the scenario?	
Q10. What are the respondents' views on the Scalability & Future Proofing aspects for the SSM and AWA solutions for the scenario?	
Q11. What are the respondents' views on the Cost Efficiency aspects for the SSM and AWA solutions for the scenario?	
Q12. What are the respondents' views on the Irish Market Context aspects for the SSM and AWA solutions for the scenario?	
Q13. What are the respondents view on where the perceived benefits lie?	
Q14. Do the respondents' have any further comments on the proposed SSM and AWA solutions for the scenario?	The principal considerations for this scenario relate to the supplier/consumer relationship. Accordingly, BGN has no comment to make on this scenario given that for each of the SSM and AWA models, there are no additional requirements of the Networks AMI (Advanced Metering Infrastructure) to facilitate it.



Question	When your Credit runs out (refer to The PAYG Customer Experience for further details)
Q8. What are the respondents' views on the Consumer Focus aspects for the SSM and AWA solutions for the scenario?	
Q9. What are the respondents' views on the Consistency & Integrated Solution aspects for the SSM and AWA solutions for the scenario?	
Q10. What are the respondents' views on the Scalability & Future Proofing aspects for the SSM and AWA solutions for the scenario?	
Q11. What are the respondents' views on the Cost Efficiency aspects for the SSM and AWA solutions for the scenario?	
Q12. What are the respondents' views on the Irish Market Context aspects for the SSM and AWA solutions for the scenario?	
Q13. What are the respondents view on where the perceived benefits lie?	
Q14. Do the respondents' have any further comments on the proposed SSM and AWA solutions for the scenario?	<p>The principal considerations for this scenario relate to the supplier/consumer relationship. Accordingly, BGN has no comment to make on this scenario given that for each of the SSM and AWA models, there are no additional requirements of the Networks AMI (Advanced Metering Infrastructure) to facilitate it.</p>



Question	Reconnecting your Supply (refer to The PAYG Customer Experience for further details)
Q8. What are the respondents' views on the Consumer Focus aspects for the SSM and AWA solutions for the scenario?	For the SSM model any failure of the reconnection message to reach the smart gas meter would result in the customer remaining off-supply. The AWA solution would lead to the adoption of a "thick" smart gas meter which typically supports the application of credit directly to the meter in the event of a communication failure, thereby allowing the customer to have supply restored promptly.
Q9. What are the respondents' views on the Consistency & Integrated Solution aspects for the SSM and AWA solutions for the scenario?	Refer to "Topping up your Credit Balance" balance comments as supply reconnection is simply a consequence of this scenario in the event that the customer is currently disconnected.
Q10. What are the respondents' views on the Scalability & Future Proofing aspects for the SSM and AWA solutions for the scenario?	
Q11. What are the respondents' views on the Cost Efficiency aspects for the SSM and AWA solutions for the scenario?	For gas PAYG, the SSM solution could lead to higher operational costs for this scenario. In the event of a failure of the radio communications link between the Electricity Meter and the Gas Meter the reconnection message would not reach the gas meter, leaving the customer off-supply. Site visits, leading to additional operational costs, could be required to resolve such issues. On the other hand the AWA solution would lead to the adoption of a "thick" smart gas meter which typically supports the application of credit directly to the meter in the event of a communication failure, thereby avoiding a site visit.



Question	Reconnecting your Supply (refer to The PAYG Customer Experience for further details)
Q12. What are the respondents' views on the Irish Market Context aspects for the SSM and AWA solutions for the scenario?	Refer to "Topping up your Credit Balance" balance comments as supply reconnection is simply a consequence of this scenario in the event that the customer is currently disconnected.
Q13. What are the respondents view on where the perceived benefits lie?	
Q14. Do the respondents' have any further comments on the proposed SSM and AWA solutions for the scenario?	

2.4 Questions on Identified Issues

Question / Proposal	Response
Q15. What are the preferred means of receiving credit balance information?	BGN does not have a view on the preferred means of receiving credit balance information. This issue is best considered by Suppliers and Customer focus groups.

Requirement (refer to Issues Identified through Stakeholder Discussion for further details)	Q16. What are the respondents' views on the outlined issues and resolution proposals?	Q17. What are the respondents' views on the cost differential of implementing the proposed workaround for SSM and AWA (including acceptable response time where appropriate)?
Communicating with the Customer	It is important that appropriate channels are chosen to allow customer's access their credit balance information. The chosen design solution should allow for the customer to: a) check their credit balance on demand; and b) receive the balance from the shipper on a regular defined basis.	The issue of identifying alternative channels applies only to the SSM model only since in the AWA, the credit balance would be available on the meter.

Requirement (refer to Issues Identified through Stakeholder Discussion for further details)	Q16. What are the respondents' views on the outlined issues and resolution proposals?	Q17. What are the respondents' views on the cost differential of implementing the proposed workaround for SSM and AWA (including acceptable response time where appropriate)?
Communications Failure	<p>Given the potential complexity of smart PPM and the potential for communication outages or latency, BGN believes that it would be prudent to have a back-up PPM solution. This is most likely to take the form of entering an appropriate code on the meter, which would be entered by the customer. BGN notes that the UK is developing a thick PPM solution, which will include this type of solution (although they have yet to finalise the details).</p> <p>It is not clear whether such technical contingencies will be available as standard on thin PPM solutions. Although the functionality could almost certainly be developed there would be the risk that it may be an "Ireland-specific" solution, which will almost certainly add to the cost of the meter and more importantly to the cost of maintaining and upgrading the PPM infrastructure.</p>	<p>BGN believes that an engineering contingency solution is best. Relying on the BGN emergency response service to restore gas supply to PPM customers during a communication outage is likely to be prohibitively expensive. There would also be the practical issue of distinguishing between people who had genuinely topped-up their credit and those who had not.</p>
Safety	Please refer to comments in PPR007	

Requirement (refer to Issues Identified through Stakeholder Discussion for further details)	Q16. What are the respondents' views on the outlined issues and resolution proposals?	Q17. What are the respondents' views on the cost differential of implementing the proposed workaround for SSM and AWA (including acceptable response time where appropriate)?
Legacy Meters	<p>BGN would obviously have to continue operating and maintaining any existing legacy meters and infrastructure, and would need to be able to recover the costs of operating this parallel infrastructure in its price control mechanism. The issue of how to incentivise customers with legacy meters to switch to smart meters is probably best addressed by shippers and the CER.</p> <p>It should also be noted that there will communications issues between the electricity meter and gas meter at some properties. In such cases, customers will not be able to upgrade to smart for technical reasons.</p>	<p>Consideration needs to be given to the existing prepayment service operated by BGN, i.e. if it will be necessary to retain this service in the long term.</p>
Debt Management	<p>BGN agree that Debt Management on the occasion of Change of Supplier is an issue that needs to be addressed. The policy decision that debt will travel to the Incoming Supplier and be managed by the Incoming Supplier thereafter may pose problems for Suppliers.</p>	<p>Debt Management on the occasion of Change of Supplier is an issue for both the SSM and the AWA.</p>



Question/ Proposal	Yes/No	Details
Q18. Are there any additional issues that need to be included? Please provide details.		