



NETWORKS

**ESB Networks Submission:
CER/13/164 The Presentation of Energy Usage
Information**

11th October 2013

1. Introduction

ESB Networks welcomes the opportunity to respond to CER's consultation on the presentation of usage information to the customer. Providing the customer with relevant and timely consumption information as envisaged by CER through the strategic framework for energy usage information should deliver the benefits of the National Smart Metering Programme (NSMP).

We welcome the decision to review the approach to supporting a mandated IHD in this consultation we believe it is also now appropriate to fully review with the industry the decision around the provision of mandate the IHD.

The following section of the submission answers the questions posed in the consultation that we feel are appropriate for ESB Networks' comment.

ESB Networks looks forward to continued engagement on this topic with all of the stakeholders.

2. Submission

Evaluation Criteria

Question/ Proposal	Yes	No	Comments
<p>Q1. Is there anything you would add or remove from these evaluation criteria?</p>	<p>Yes</p>		<p>Section 2 of the presentation of Energy Usage Information Consultation Paper outlines the strategic frame work for energy usage information provision to customers in order to deliver the benefits of the NSMP. This strategic frame work was developed & agreed over many industry workshops. It describes the unique requirements of each communication channel, which complement the overall strategic frame work in order to deliver the benefits of the NSMP. Furthermore it reflects/compliments the roles of the major stakeholders as set out in the Steady State Model (SSM) consultation paper. Hence ESB Networks suggests that an additional evaluation criteria should be added entitled <i>'Adherence to Strategic Frame Work for Energy Usage Information Provision to Customers'</i></p>

General questions on all requirements

Requirement	Q2a. What are the respondents' views in regards to the definition of each of the requirements below? Are there any requirements that should be dropped?	Q2b. Please provide your views on the relative impact assessment of the different options delivering each requirement in terms of the alignment to the evaluation criteria in the template table provided below.
SBR01: Energy Statement Arrangements and Communication Method	No response	The Steady state model envisages ESB Networks delivering interval data daily to electricity suppliers. This will support suppliers delivering this requirement.
SBR02: Electricity and Gas Time of Use Information	No response	
SBR03: Year-on-Year Energy Usage Comparison	No response	The Steady state model envisages ESB Networks delivering interval data daily to electricity suppliers. This will support suppliers delivering this requirement.
SBR04: Additional Contact information	No response	
SBR05: Hints and Tips	No response	
SBR06: Complimentary Billing Information	No response	
MIHDR01: Instantaneous Active Electricity Demand (Real-	Agree	The steady state model will support the delivery of this requirement.

Time)		
MIHDR02: Up to Date Consumption Position in Time Period (Cumulative)	<p>The MIHD is the primary information source for real-time information in the absence of an alternative and as such it should only provide cumulative information for the day in question as this information is not available anywhere else. Cumulative information for other periods – current week and current month should be taken from the Supplier smart bill/web portal.</p>	<p>Presentation of same day cumulative consumption on the MIHD are in line with the Steady State Model, maintains the primary relationship between Consumers and their Supplier and meets the requirements of strategic frame work outlined in section 2 of the paper. The presentation of cumulative consumption on the MIHD outside of the in day period will interfere with the primary relationship between Supplier and Consumer. There would be confusion for the customer as they would no longer have a ‘single source of truth’ for this data as it will also be available on the Suppliers web portal for example. Furthermore, this will present data protection issues.</p> <p>Mandating this requirement may not be consistent with future replacement devices where the data beyond same day will come from Suppliers own back end systems.</p>
MIHDR03: Past Period Consumption Comparison (Historical)	<p>ESB Networks view is that in the absence of an alternative, the MIHD is the primary information source for real-time information. As such it should not provide historical energy consumption information for previous days, weeks or months as this information can be taken from the Supplier smart bill/web portal.</p>	<p>The presentation of historical energy consumption information on the MIHD would interfere with the primary relationship between Supplier and Consumer. In addition, there would be confusion for the customer as they would no longer have a ‘single source of truth’ for this data as it will also be available on the Suppliers web portal for example.</p> <p>Furthermore, this would present reliability and data protection issues. This could lead to complex and costly business processes on behalf of both networks and suppliers to address these issues.</p> <p>The COLE process (typically 250,000 – 350,000 each year) would generate additional ongoing costs to the program to ensure that historical data on an IHD from one customer is not to be</p>

		<p>made available to the new customer.</p> <p>Suppliers will be heavily involved in this process as it is they that have to ensure the correct customer is registered for each meter point.</p> <p>Mandating this requirement for a mandated IHD may not be consistent with future replacement devices where historical data will come from Suppliers own back end systems.</p>
<p>CWIR01: Access to Historical Consumption Information in a National Harmonised Format</p>	<p>ESB Networks agrees that the Customer should have the ability to access their half hourly interval consumption data on request via the internet. It should be provided to them in a standard harmonised format to enable them to analyse or share the interval data with an alternative Supplier or 3rd Party (subject to the Consumers consent) offering other services.</p> <p>ESB Networks believes that this service should be provided by Suppliers only, in line with their present market role & re-enforced in the Steady State Model consultation paper.</p> <p>The intention that ‘The Consumer will have access to at least 24 months data or data from the start of their supply contract (Supplier provided service); or 24 months data or data from the point of smart meter installation (Networks provided service)’ goes beyond the requirement of the EU Directive. ESB Networks is not aware of the justification for this additional requirement and the</p>	<p>Supplier provided services are in line with the Steady State Model, this maintains the primary relationship between Customers and their Supplier and meets the requirements of strategic frame work outlined in section 2 of the paper.</p> <p>With Supplier provided services customers’ entitlements to energy usage data from their ‘old’ Supplier will be strengthened.</p> <p>With Supplier provided services only, there is clarity for the consumers in that they only have to deal with their Supplier(s).</p> <p>The program can build on the fact that Suppliers are already providing internet services to their consumers, so the most cost efficient approach is to enhance these services. ESB Networks have no such services, so creating and duplicating a Supplier Service is not cost efficient. The validation processes from an ESB Networks perspective are also complex.</p> <p>There are no additional benefits accruing from duplicating services to be provided by both Suppliers & ESB Networks. This will only add cost to the program and the customer.</p>

	<p>increased benefit delivery for the NSMP in implementing same.</p> <p>A requirement could be introduced such that, once a customer switches Supplier that the 'old' Supplier would have to provide the consumer with at least 24 months data or data from the start of their supply contract in a standard harmonised format . This would not be an unusual requirement, for example regulations in the insurance industry requires the incumbent insurer to provide a claims statement at time of policy renewal to allow the customer to shop around.</p>	
MIHDR01(a): Instantaneous Cost of Demand for the Hour	Agree	This will be delivered as per the steady state model with suitable arrangement to input the relevant cost information directly into the MIHD or alternative devices.
MIHDR02(a): Up to Date Cost Position in Time Period (Cumulative)	<p>ESB Networks view is that in the absence of alternatives the MIHD is the primary information source for real-time information and as such it should only provide cumulative cost information for the day in question as this information is not available anywhere else. Cumulative cost information for other periods – current week and current month should be taken from the Supplier smart bill/web portal which is the single source of the truth.</p>	<p>Presentation of same day cumulative cost data on the MIHD are in line with the Steady State Model maintains the primary relationship between Consumers and their Supplier and meets the requirements of strategic frame work outlined in section 2 of the paper. The presentation of cumulative cost data on the MIHD outside of the in day period will interfere with the primary relationship between Supplier and Consumer.</p> <p>In addition, there would be confusion for the customer as they would no longer have a 'single source of truth' for this data as it will also be available on the Suppliers smart bill/web portal for example.</p> <p>Furthermore, this will present reliability and</p>

		<p>data protection issues.</p> <p>This may not be consistent with future replacement devices where the cost data beyond same day will come from Suppliers own back end systems.</p>
<p>MIHDR03(a): Past Period Cost Comparison (Historical)</p>	<p>ESB Networks view is that in the absence of alternatives the MIHD is the primary information source for real-time information and as such it should not provide historical cost data information for previous days, weeks or months as this information should be taken from the Supplier smart bill/web portal.</p>	<p>The presentation of historical cost data information on the MIHD will interfere with the primary relationship between Supplier and Customer</p> <p>In addition, there would be confusion for the customer as they would no longer have a 'single source of truth' for this data as it will also be available on the Suppliers smart bill/web portal for example.</p> <p>Furthermore, this will present reliability and data protection issues. This could lead to complex and costly business processes on behalf of both networks and suppliers to address these issues e.g. COS, CoLE. For example COLE process (typically 250,000 – 350,000 each year) would have ongoing cost to the program to ensure that historical data on an IHD from one customer is not to be made available to the new customer.</p> <p>Suppliers will be heavily involved in this process as it is they that have to ensure the correct customer is registered for each meter point. This may not be consistent with future replacement devices where historical data will come from Suppliers own back end systems.</p>
<p>MIHDR04: Ambient Feedback of Electricity Time</p>	<p>Agree</p>	

of Use Tariffs		
MIHDR05: Tariff and Price Information		

Question/ Proposal	Comments
Q2c. Are there any additional requirements that should be considered, please provide rationale and assessment?	The requirements for real time information are addressed only in the context of a particular temporary device ie the MIHD. It would have been worthwhile to define the requirements in terms of the persistent real time information data for that particular channel which could include MIHD, other IHDs or equivalent rather that focus on a single device..

Questions on specific requirements

Question/ Proposal	Comments
Q3. What would be the least frequent level of data refresh that would be appropriate in order not to adversely affect the ability of the consumer to control their energy consumption effectively?	ESB Networks agrees that the requirement is ‘to present the Consumer with their instantaneous level of electricity demand in kW, in as near real-time as possible, to show the immediate impact of their actions with regards to energy consumption. Data should be refreshed frequently enough to be able to effectively link the Consumer with their current behaviour’. However, it is premature at this stage to prescribe a specific time and could be interpreted as bias in favour of particular products, in advance of decisions on technology and the delivery of the full suite of requirements.
Q4. What are the	The MIHD unique role is in the absence of any alternative to provide real time

<p>respondents' views in regards to the definition of each of the potential requirements for display of cost and price/tariff information on the MIHD?</p>	<p>information to the customer. It fits within the strategic frame work which was developed & agreed over many industry workshops. It complements the other channels.</p>
<p>Q5a. What are the respondents' views in regards to the display of cost and price/tariff information on the MIHD for the options described above?</p>	
<p>Q5b. Is it a viable option for consumers to be asked to update price and/or time band information?</p>	<p>Not only is this approach viable but it is essential to having an engaged customer who actually knows how much they are paying for their energy. It would also strengthen the relationship between the customer and their energy supplier as the energy supplier would have to ensure that they were aware of all price changes.</p>
<p>Q5c. Is it appropriate to expect suppliers to provide an alternative device to consumers who opt for alternative tariffs?</p>	
<p>Q6a. What are the respondents' views with regards to the options for access to data for 3rd parties and the minded to position for the Customer to access and pass on this data?</p>	<p>ESB Networks agrees that the correct option for providing data for 3rd parties is for the customer to access their own data and then pass on this data to third parties. This approach will address any data protection issues, as well as removing the requirement for costly & complex access requirements for authorised licensed third parties under proposals 4.5.2 B,C &D..</p>

<p>Q6b. What are respondents' views on the options and minded to position for who is best placed to provide the national harmonised data to Customers?</p>	<p>ESB Networks believes that this requirement is best delivered through Supplier provided services only.</p> <p>ESB Networks reasons for this are outlined under answers to question 2a & 2 b for requirement CWIR01: Access to Historical Consumption Information in a National Harmonised Format.</p>
<p>Q6c. Are there any alternative options that should be considered, please provide rationale and assessment?</p>	<p>No. ESB Networks view is that the correct option for providing data for 3rd parties is for the customer to access their own data and then to pass on this data to 3rd parties.</p>
<p>Q6d. Should there be guidance or regulation on how Customers are told that they request this data (e.g. if a Customer contacts a supplier for data, should the supplier notify Customers they can get data from networks beyond start of contract and/or export data?</p>	<p>ESB Networks believes that this requirement is best delivered through Supplier provided services only.</p> <p>In that case this matter does not arise.</p>
<p>Q6e. What would be the longest period that it would be appropriate for a consumer to wait to receive data through the web interface?</p>	<p>At this stage in the National Smart Metering Programme, the consultation papers are establishing the high level functional requirements. ESB Networks does not believe it is possible to comment on the Service Level Agreement requirements for access to historical consumption information at this point.</p>
<p>Q6f. What would be the most appropriate</p>	<p>At this stage in the National Smart Metering Programme, the consultation papers are establishing the high level functional requirements. ESB Networks does not</p>

<p>national harmonised format for the data download?</p>	<p>believe it is possible to comment on the technical delivery requirements for access to historical consumption information at this point.</p>
<p>Q7a. What are the respondents' views in regards to not regulating for benchmarking at this stage, but expecting this to happen in the open market and to review and revisit this in the future?</p>	
<p>Q7b. What are the respondents' views on the presentation of micro generation information to the Consumer? What are the options?</p>	

Questions on other policy considerations

Question/ Proposal	Comments
<p>Q8a. What are your views with regard to a 2 year support period? Should the MIHD be supported for a shorter or longer period of time, to a fixed date or any alternatives? Please provide reasons.</p>	<p>The support of the mandated IHD is inextricable linked to the provision of a mandated IHD. Given the scale of the costs involved, we believe just as it represents good governance to review the support decision for the mandated IHD it is also now appropriate to review the proposal around the provision of mandate the IHD.</p> <p>It the light of the above and also taken into account the strategic issues which are not yet resolved we cannot provide a numerical answer to CERs question around support.</p>

	<p>Some of the issues that need to be resolved before a number can be given around support include:</p> <p><u>Support requirements are undefined.</u> We do not know if support is replacement on demand of devices that are problematic or lost. We do not know if support is to ensure a working device or if support is about helping people to understand and use the IHD.</p> <p><u>The ownership model for the mandated IHD is undefined.</u> Is the display attached to the premises and therefore will assumed to remain when there is a change of legal entity or is it assumed to be the property of the customer and they bring it with them when they move. There are 250,000 – 350,000 changes of legal entities each year. Does each of these new legal entities have an entitlement to a new display?</p> <p><u>The IHD product life requirements are undefined.</u></p> <p><u>The roles of the industry stakeholders in support are not defined.</u></p> <p>The point of contact for the customer is the supplier; they could provide first level support for example, with more complex technical issues being passed on. The stakeholder’s role in support should be consistent with their current industry roles.</p> <p>We believe that much more work is required and many other issues need to be resolved before a decision on the time over which a MIHD should be supported.</p>
<p>Q8b. What are your views with regard to options for supporting the provision of energy usage information within the home post the mandated support period of the MIHD?</p>	<p>If the MIHD requirements are focused on its primary purpose i.e., real-time information and does not have historical cost and usage data then transition will be easy.</p>
<p>Q9. What are your views on the benefits to Consumers of the frequency of informative</p>	

<p>billing? Should this be 'not less' or 'not more than' per Customer type or should it be specific where smart meters are installed e.g. monthly?</p>	
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Data Availability and Protection

Question/ Proposal	Comments
<p>Q10a. What are your views on the data protection approach set out above?</p>	
<p>Q10b. Are there any other data protection considerations CER should consider in relation to the requirements set out in section</p>	<p>In the section 2.5 where the customer interactions with the information channels are shown the interaction with the IHD is shown as being on a daily basis. If historical data is kept to same day only then no data protection issues will arise with the IHD. There are 250k-350k Change of Legal entities each year in the electricity industry. CER will have to come up with new or amended market processes to deal with this issue if the IHD is full of historical personal data. Given the volumes of such processes there is likely to be a considerable cost to the industry and ultimately the customer. Furthermore ESB Networks are concerned that a decision to provide a mandated IHD full of personal historical information and a requirement that this is then wiped off during a COLE process could expose us to potentially be in breach of data protection regulations if for example the IHD was not switched on or out of range and therefore we could not communicate with it when the COLE process happened.</p>

3. Conclusion

The strategic framework for energy usage information provision to customers envisaged by CER should deliver the benefits of the National Smart Metering Programme (NSMP). The framework recognises the unique requirements of each communication channel and the core purpose of that channel, whether it is the smart bill, web interface or in home display or equivalent. These communication channels should focus on delivering their primary information within timescale, hence not hindering the effectiveness of the most appropriate channel. In particular, this can be said of the MIHD.

The primary relationship with every customer is through the electricity supplier. They are the source for usage information and it is they that will deliver and engage to educate the customer. ESB Networks looks forward to supporting suppliers by providing them with information consistent with the steady state model for smart metering previously proposed by CER.

The program can also build on the fact that Suppliers are already providing internet services to their customers, so the most cost efficient approach to meeting the customer web interface requirement is where necessary is to enhance these services. ESB Networks have no such services, so creating and duplicating a Supplier Service would not be cost efficient. We believe the correct option for providing data for 3rd parties is for the customer to access their own data from suppliers who have it and then pass it on.

In terms of the proposed functionality for a mandated IHD we believe it that the absence of alternatives the MIHD is the primary information source for real-time information. The mandated IHD will present major cost and risk challenges for the program. Good design principles dictate that as long as the device delivers the benefits it was mandated to do that it should be kept as simple as possible. We can avoid complexity, customer confusion, cost and data protection issues by not storing historical data on the device. Such data will be available via other channels for customers as per the strategic framework

We welcome the decision to review the approach to supporting a mandated IHD. As shown in our response there are a myriad of complex issues that need to be considered by all the stakeholders in the program before any decision on support can be made. The support of the mandated IHD is inextricable linked to the provision of a mandated IHD.

Given the scale of both up front costs and on-going costs, technology developments, customer preference and the unique nature of what was proposed for Ireland, we believe it is also now appropriate to fully review with the industry the decision around the provision of mandate the IHD.