



Tictoc platforms ltd.
West Curragh,
Naul,
Co. Dublin.
12.05.2015

Smart Metering Programme Office
Commission for Energy Regulation,
The Exchange, Belgard Square North,
Tallaght,
Dublin 24.
REF: CER/15/053
REF: CER/15/054

To whom it may concern,

Please read tictoc platforms response to CER National Smart Metering Program; Smart Pay As You Go and Managing the Transition to Time-of-Use Tariffs. In general tictoc agree with the direction the CER is going, however we believe there are some serious oversights that should be addressed:

- 1: 24 hour data keep;
- 2: Distributed resources and REFIT charge;
- 3: Energy supply as a social right;
- 4: Energy storage (which side of the meter); and
- 5: EV charging TOU solutions.

We shall elaborate on these below. tictoc stress the Social implications of the decision process, the top-down approach of these consultancies by the CER. The CER/13/286 smart meter paper was due to be released in the first quarter of 2014. This was postponed to the 14.10.2014, the **same day the water charges were released**; the water charges created social and parliament uproar that is still causing social unrest. The decision paper went through somewhat unheard. If we don't take the public into the decision discussion, you can expect the same resilience – the simplicity of typing smart meter into you-tube, the first results include:

- 1 - No Privacy with Smart Meters | Big Brother Watch**
- 2- The Dark Side of 'Smart' Meters**

These are just the first 2 of thousands that come out. If any of these go viral, prior or during scheduled roll out, you can only expect the same or even greater resilience (probably from the same people).

The smart meter (or better AMI Advanced Meter infrastructure) is something that can completely change the identity of energy services, and finally empower consumers can make informed decisions and eventually help towards our CO2 targets. A triple win for the Consumer, Utilities and the Environment.

tictoc see education as fundamental to the success for all parties, education can be dispersed in many forms, via traditional media, campaigns, social media. tictoc offer our expertise to any stake holders who may be of interest. Over the last number of years tictoc have gained valuable consumer insights in the Utility sector, applying knowledge of design for effective behavioral change, tictoc solutions raise awareness, inform decisions and provide motivation.

Kind regards
James Ennis – director tictoc platforms ltd.



A possible solution to gain consumer trust and key insights to making the roll out socially acceptable are pilot projects, these can be partly funded by interested parties tendering for procurements as metering and community heating schemes.

22,000 new social housing homes will be built before the smart meter roll out (see appendix 1). tictoc see this as a huge opportunity to pilot projects and explore different metering options and systems. Not only can this provide Education of the benefits of smart-metering to public, it can provide valuable knowledge and meaningful insights to the sector, in particular the CER and Networks for the procuring the 2.2 million meters to be installed.

We expand on our 5 points below, and recite tictoc's consistent approach to the CERs understanding of technology development and what technology will be able to empower by 2018.

1: 24 hour data keep

This stifles any potential innovation in the sector, and has no benefits to any party other than making networks job easier with today's technology, where as we should understand what will be available in 2018. Today in Brazil 80,000 meters are being rolled out using A FAN architecture system that provides real-time secure data provision.

Why is the CER insisting on 30min interval readings and with holding these 48 readings and only release them once daily?

tictoc have analyzed the data from the 5000 meters plus ESB smart meter trail (2010) and have recognized a number of patterns over the 12 months. When these occur during the day, tictoc could help/assist homes in fuel poverty to take advantages when intermittent production is high, demand is low – this, or any other signaling will not be possible if we or an other 3rd party cannot receive the more frequently. The consumer should have the right to share their data with whom they like (complying to regulations).

2: Distributed resources and REFIT charge

tictoc regret the neglect of even mentioning a feeding charge to the grid on these papers.

3: Energy supply as a social right

Could energy and social housing/welfare be packed into the same bundle for certain demographics in fuel poverty? As in Belgium and states in Italy, letting a minimum base load into the abode; for example a max load of 1000w, keeping fridge and light in the premises, this can be paid back when user tops Up at a later date. Rather than discussing at what point they should be cut off.

4: Energy storage and

5: EV charging TOU solutions (which side of the meter)

The Government has set a target of ensuring that 10% of all passenger vehicles (equivalent to 230,000 vehicles) are electric by 2020. This will have a substantial impact on the Grid but TOU and pre-pay will play a fundamental role in achieving the governments targets.

tictoc regret the neglect of even mentioning of home storage or EV solutions,

These 5 points re-states the Smart-Meter roll out stake holders are not following technological or social trends, and what will be available and acceptable to the consumer in 2018. If these points are not addressed, tictoc fear a repeat of the water meter fiasco.



Appendix 1 | Social housing 2017

| Local Authority | Provisional Funding Allocation (Current and Capital in Euro) | Targets 2015 - 2017 (No. of Housing Units per LA) | Impact on Local Housing List Numbers %* |
|------------------------------|--|---|---|
| Carlow County Council | €20,159,918 | 435 | 42% |
| Cavan County Council | €12,522,802 | 240 | 32% |
| Clare County Council | €26,065,405 | 529 | 26% |
| Cork City Council | €124,390,671 | 1349 | 21% |
| Cork County Council | €80,555,618 | 1217 | 25% |
| DLR County Council | €61,030,770 | 681 | 20% |
| Donegal County Council | €34,113,918 | 507 | 30% |
| Dublin City Council | €292,194,455 | 3347 | 21% |
| Fingal County Council | €81,041,413 | 1376 | 23% |
| Galway City Council | €28,273,219 | 518 | 21% |
| Galway County Council | €30,173,232 | 608 | 29% |
| Kerry County Council | €62,028,669 | 1058 | 26% |
| Kildare County Council | €86,858,105 | 1283 | 24% |
| Kilkenny County Council | €43,601,703 | 686 | 41% |
| Laois County Council | €31,077,456 | 366 | 41% |
| Leitrim County Council | €4,384,968 | 119 | 47% |
| Limerick City and County Co | €57,819,207 | 753 | 27% |
| Longford County Council | €7,608,289 | 210 | 35% |
| Louth County Council | €57,224,354 | 778 | 20% |
| Mayo County Council | €30,265,764 | 566 | 38% |
| Meath County Council | €27,823,238 | 519 | 21% |
| Monaghan County Council | €11,546,622 | 205 | 29% |
| Offaly County Council | €16,384,074 | 385 | 33% |
| Roscommon County Council | €5,579,135 | 152 | 60% |
| Sligo County Council | €20,174,141 | 301 | 39% |
| Sth Dublin County Council | €73,255,580 | 1445 | 23% |
| Tipperary County Council | €57,103,226 | 832 | 42% |
| Waterford City and County Co | €35,048,348 | 760 | 40% |
| Westmeath County Council | €30,654,575 | 542 | 29% |
| Wexford County Council | €25,356,554 | 677 | 27% |
| Wicklow County Council | €31,035,770 | 438 | 22% |
| Total | 1,505,351,200 | 22,882 | Nat Avg 25%** |

*Housing waiting list figures based on the most recent Housing Needs Assessment by the Housing Agency.

**The impact on the housing list in each county will vary due to different housing market costs in each county.

The 25% reduction in the housing waiting list will also be accompanied by a targeted assistance of 28,000 people through the HAP scheme to give them supported accommodation in the private rented sector.