MEGA Response to CER/15/272: CER National Smart Metering Programme Empowering & Protecting Customers

Question 1

Do you have any views on the CER's Proposed Decision to clarify policy on the Harmonised Downloadable File (HDF) to ensure that updates are incorporated (and hence made available to interested customers) in a timely manner, and frequently?

Although the proposal is sufficient for customers or a broker to compare price plans, it is not sufficient for more real-time smart grid applications, who may very well settle accounts for periods shorter than the typical energy bill (including intra-day). Data may have to be available quicker if a consumer has subscribed to such a service, say within the next interval, and the interval may have to be shorter to accommodate more dynamic future smart grid services, say 5 minutes. When downloading the HDF the customer could have the option to aggregate the data for longer intervals (such as the SEM settlement period). It may be that these functions become available as part of the AMI interface for Industry Market Participants instead, as envisioned by the 2013 Proposed Decision Paper on the Core Design.

It should be clarified to what data the 24 hours applies. If the updates that are to be incorporated originate from the daily update that Suppliers will receive, then strictly speaking the oldest data in the day will never be available within 24 hours.

Question 2

Do you have any views on the CER's Proposed Decision for minimum standards for the provision by Suppliers of "at a glance" information to residential customers, to complement the Smart Bill and Energy Statement, and access to a Harmonised Downloadable File (HDF) of their consumption data?

The traditional hierarchical structure of SEM-Supplier-Consumer will no longer apply in a future smart grid. In the smart grid, Third Parties will provide innovative consumer services which will affect the cost of energy for the consumer and may be settled separately from the Supplier. Settlement may not be based on tariffs, it may not even be related to energy but instead relate to flexibility, but all the same will affect consumer behaviour and the total cost of consumption for the consumer, and the final total cost will not be known by either party. This can already be seen today in the SEM with the retail Supplier and DSU aggregator 'serving' the same consumer and the consumer paid by the DSU for flexibility, which the consumer considers to be savings on the energy bill. Other similar aggregator and VPP type services will be developed in the smart grid. How then to provide coherent information 'at a glance'?

Information 'at a glance' must be for the electricity consumer what the search engine is for the internet user, creating a simplified view of the inevitably more complex electricity market. It will have to integrate all costs and revenues for the consumer, potentially from several parties. It may therefore be

provided by Supplier and/or Third Party and data will have to be shared between them.

Suppliers should not deliver any hardware to consumers, as it is currently suggested, since that is likely to create barriers for consumers to switch Supplier. Information 'at a glance' should be provided on open platforms (e.g. Android apps). We see the Supplier as maintaining the basic relation between consumer and wholesale energy markets through fixed or TOU tariffs. Advanced services such as those designed to change alter consumer behaviour through shared revenues should be provided by Third Parties (who could also be a Supplier). What is required is the provision of real-time data to the consumer through an appropriate receiver to include – Voltage, Amperes, Reactive Power, Active power, Phase Angle, power Factor & Frequency. PLC seems the most appropriate meantime of transporting this data from the meter through the external wall to the consumer. Possibly to a simple Modbus Gateway. This should provide an open interoperable system for use by the consumer or any third party contracted by the Prosumer. It would also provide the Retailer with a simple way to interface their own IHD/Dashboard.

Question 3

Do you have any views on the CER's Proposed Decisions on the need to amend and augment rules on the presentation of tariff information, consequent to the introduction of Time-of-Use Tariffs?

No, we agree rules should be established although it will not be a trivial task to define rules which will not restrict innovation.

Question 4

Do you have any views on the options set out in section 3.3.4 for giving practical effect to the concept of simple labels and standard metrics to enable customers to understand and compare Time-of-Use tariffs more easily?

No.

Question 5

Do you have any views on the CER's Proposed Decision to amend the disconnection process in order to maintain comparable levels of customer protection in the context of disconnection (and reconnection) not requiring a site visit in order to undertake physical works following the rollout of smart meters?

Connecting and disconnecting customers remotely is one of the main advantages of smart meters, but fair procedures should clearly apply as per the proposed decision. It should be noted that customers may be temporarily disconnected (or de-energised) with full co-operation from the consumer as part of a Third Party smart grid service, e.g. to facilitate islanding when supply and demand must be balanced locally. This should be supported, technically as part of the AMI.

Question 6

Do you have any views on the CER's Proposed Decision not to develop more extensive changes to the framework of regulation and access to data for third party intermediaries at this stage - but to keep to issue under review as part of it wider work programme on Retail Policy?

Yes, we agree that the market for energy services is still at an early stage: many wonderful things will happen but even though we believe we have a pretty good idea what those will be, we can understand the need for careful regulatory consideration.

One concern is the risk to security and privacy that the HAN introduces. E.g. data may be obtained via the HAN by a smart device such as a HMS (or an IHD providing information 'at a glance'), but a program on that device (app or indeed a virus) may then transfer this data to a third party via a separate, not necessarily secured channel, possibly even unbeknownst to the consumer. This can be avoided if all possible interaction with the meter is via the AMI so it can only ever be accessed by properly licensed Third Parties. The HAN should only be used by a single licensed non-app IHD device. Since such device will probably only show basic information, it should be considered whether there are not any better channels to deliver this information so that the HAN would not be needed at all. It future-proofs the solution since the technology to be chosen for the HAN will be tightly integrated with the smart meter and cannot easily be upgraded. What is required is the provision of real-time data to the consumer through an appropriate receiver to include – Voltage, Amperes, Reactive Power, Active power, Phase Angle, power Factor & Frequency. PLC seems the most appropriate meantime of transporting this data from the meter through the external wall to the consumer. Possibly to a simple Modbus Gateway. This should provide an open interoperable system for use by the consumer or any third party contracted by the Prosumer. It would also provide the Retailer with a simple way to interface their own IHD/Dashboard.

Question 7

Do you have any views on the CER's Proposed Decision on different forms of NSMP participation, and the role of policy in respect of customers who do not participate fully?

The way to maximise participation is engaging with the customer, often. Key is unrestricted access to real-time billing and non-billing related smart meter data by Third Parties, subject to customer consent. The Core Design described in the 2013 Proposed Decision is vital for such services. We agree that care must be taken until the details of the Core Design (technical platform) are worked out. We would like to suggest that the details should be worked out by a multi-disciplinary and multi-stakeholder workgroup. We are very interested in joining such an activity and believe can add value to it. What is required is the provision of real-time data to the consumer through an appropriate receiver to include – Voltage, Amperes, Reactive Power, Active power, Phase Angle, power Factor & Frequency. PLC seems the most appropriate meantime of transporting this data from the meter through the external wall to the consumer. Possibly to a simple Modbus Gateway. This should provide an open interoperable system for use by the consumer or any third party contracted by the Prosumer. It would also provide the Retailer with a simple way to interface their own IHD/Dashboard.