

Smart Metering Programme Office  
Commission for Energy Regulation,  
The Exchange, Belgard Square North,  
Tallaght,  
Dublin 24.

22<sup>nd</sup> January 2016

## **Electric Ireland response to CER Proposed Decisions 15/273 Regulating the Transition Activities of Market Participants**

### **Electric Ireland's position on the National Smart Metering Programme**

Electric Ireland has been a consistent and active participant in the CER's National Smart Metering Programme (NSMP) since its inception, during its Trials and subsequent Design phases. Our customers, employees and systems have participated in the trialling of most of the concepts that have either evolved into decisions by the CER or have been discontinued from the Programme. In our response to CER Proposed Decision 15/272 Empowering & Protecting Customers we have set out our position, including our concerns on the direction of the NSMP, we would ask the CER to refer to these before reading our response to this paper.

### **Response to Regulating the Transition Activities of Market Participants Proposed Decision Paper:**

Electric Ireland welcomes the opportunity to respond to the 'Regulating the Transition Activities of Market Participants' proposed decision paper which considers the activities necessary to deliver and commission the new technical platform and the regulatory framework that should underpin those activities. As stated in our response to consultation 15/138 that the CER issued on these activities, Electric Ireland welcomes the pragmatic approach that the CER has taken with this paper and in the absence of any detailed changes proposed for Suppliers, should this approach continue we feel confident of a rational and reasonable outcome. However we remain cautious regarding the scope for CER to impose or prescribe onerous obligations on Suppliers during the transition to smart metering should it proceed.

**Question 1:** Do you have comments on the CER's Proposed Decision for regulating the transition activities of market participants, or further evidence or reasoning that you consider to be relevant to the Proposed Decision?

### Rollout

We welcome the inclusion for a licence requirement for the Network companies to engage with industry stakeholders and consider their views in developing the integrated rollout plan. However given that ultimately it is Suppliers that have the relationship with customers and who are best placed to represent their interests it is extremely important that the Network companies agree the plan, rather than just consider views of industry stakeholders in developing the rollout plan. We would ask that this be reflected in the final decision wording.

In the last consultation paper on this topic several factors were set out that the CER felt will shape the approach to rollout, Electric Ireland provided feedback on these factors and recommended the addition of factors e.g. customer experience of installation, technology advancements, international experience and we would hope that they will be taken into consideration in the development of the rollout plan.

### Testing and trialling

Electric Ireland agrees that if testing and trialling is not coordinated this could lead to inefficiency and planning conflicts for Suppliers with gas and electricity portfolios. We agree with the proposed decision that it is not appropriate to place a licence obligation on ESB Networks and GNI to jointly produce and maintain a coordinated market processes testing and trialling plan.

It is our opinion that there is already a successfully deployed approach to schema releases by the industry with final sign-off sitting with the CER and we would expect that the current obligations on market participants would apply equally to the NSMP. However, given the scale and investment required by industry participants in the planned NSMP Electric Ireland agree that it is important that all Suppliers and Shippers cooperate in the completion of the testing and trialling plan and we consider that it is appropriate to place a licence obligation on Suppliers and Shippers, to use reasonable endeavours to comply with the approved testing and trialling plan.

## Participant readiness

Electric Ireland agrees that the existing assurance regimes administered by RMDS and GMARG provide the right foundation for NSMP readiness but that given the scale and depth of change within participant businesses these regimes should be complemented by a wider participant readiness activity that would report regularly on the status of individual participant change programmes.

A central Participant Readiness function being established as part of the CER's PMO that pulls together readiness status reports from the gas and electricity Assurance Bodies and the reports on status of the individual participant change programmes, to provide an overall assurance status report for both the CER and industry to track, seems to be a prudent approach.

Electric Ireland agrees that this function would not require any changes to the regulatory framework as the existing Assurance Bodies are already facilitated and the additional functions are consistent with the established NSMP programme management and governance arrangements. We would seek that the CER publish the readiness criteria that it will likely be using with its decision paper in April this year.