

Date: 20/10/2020

EAI Response to CRU Consultation on Comparison Tools for Time of Use Tariffs (CRU20/108)

By email to Smartmetering@cru.ie

The EAI welcomes the opportunity to respond to the consultation on Comparison Tools for Time of Use Tariffs (CRU20/108), regarding the application of the Estimated Annual Bill (EAB) for the Standard Smart Tariffs (SSTs).

EAI members recommend that, if they are introduced at all, EABs for SSTs be implemented in 2022 rather than 2021, given limited supplier capacity and the current availability of data and information. Before any introduction of an EAB for SST, we believe that a holistic review of the range of information given to customers should be conducted with a view to determining whether the range of information being given to customers is translating to customer comprehension and therefore empowerment.

1. Supplier Capacity

The CRU's EAB proposal would require implementation in suppliers' systems, given the EAB must be used in customer communications (e.g. annual prompt and 30-day notice letters). However, ESBN have yet to release the final load profiles that CRU propose suppliers use to generate the EABs. The load profiles are scheduled for release in November, and therefore suppliers would have less than two months to design, build and test the EAB proposal.

Furthermore, suppliers are at a late stage in Smart Programme implementation. Focus is being placed on finalising 'build' and engagement in Inter Participant Testing. Given the capacity constraints that suppliers face, it may not be feasible to implement these proposed requirements by January 2021.

2. Data & Information Availability

The CRU proposes to use load profiles to generate the SST; however, it is not clear whether sufficient data exists to generate the profile. We are concerned that the use of a load profile which is not applicable to a Smart Services customer may be considered a misleading practice, and therefore damages the integrity of the use of comparison tools.

Given the impact the load profile might have on consumers and the necessity to ensure a robust and accurate profile which does not mislead customers, it may be best that EABs are implemented in 2022, when twelve months' of consumption data is available to generate a more robust load profile. Implementation in 2022 after a review of the overall range of information given to customers would also allow CRU to have sight of all ToU tariffs that are introduced by suppliers and it would be able to consider how EABs may work for ToUs in a broader context, alongside other information given to customers, in particular noting that Smart Services customers will also necessitate an educational aspect on smart services in general.

To conclude, EAI recommends that, if EABs are introduced for SSTs at all, the proposal be delayed until 2022 at the earliest, in order to allow a sufficient period to address the issues of supplier capacity information availability and a holistic review of consumer information and comprehension.



As always, we are available to meet and discuss this position further and look forward to further engagement before any further development of this regulatory proposal.

Electricity Association of Ireland, 20th of October