



An Coimisiún  
um Rialáil Fóntais  
**Commission for  
Regulation of Utilities**

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# Call for Evidence on Active Consumers & Jointly Acting Active Consumers under the Clean Energy Package

## Call for Evidence

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## Public Impact Statement

This Call for Evidence is being provided to industry and interested participants to request feedback on initial considerations the CRU has with regards to the progression of the implementation of regulatory frameworks around active consumers as required by the European Legislation under the Clean Energy Package.

This is one of two Calls for Evidence being published on topics relating to consumer empowerment under the Clean Energy Package. The second Call for Evidence (CRU/20099) deals with the participation of energy communities in the Irish electricity sector. The primary difference between the customer groups being addressed in this paper as compared to those in energy communities is that active consumers and jointly acting active consumers are bound to geographic proximities, meaning that they must be based on a single premises or in the same apartment block, whereas members participating in energy communities can be located in separate premises, but acting together. These two types of consumer groups have many overlapping rights and entitlements, but also enough unique aspects that the CRU was of the view that two separate papers were needed to address all the relevant topics.

The purpose of this paper is to highlight the relevant legislation that led the CRU to identify this area as a key deliverable for the implementation of the Clean Energy Package and to initiate conversations on active consumer engagement with interested industry participants, service providers and potential active customers who may be interested in contributing to the discussion on active consumers in this early stage.

The CRU aims to involve as many participants as possible in the discussions on active consumers and energy communities and this Call for Evidence is one way that the CRU hopes to engage stakeholders to obtain their views on the subject. The CRU plans to obtain consumer feedback through alternative means, such as through the Consumer Stakeholder group<sup>1</sup>.

The complex nature of the topics on active consumers and energy communities means that the traditional ways that the CRU engages with stakeholders through Consultations and stakeholder events may not be suitable to reach all consumer groups the CRU would like to

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<sup>1</sup> The Consumer Stakeholder Group (CSG) is comprised of groups and entities which engage with the CRU to discuss matters relating to consumer interests. These meetings occur quarterly and serve as a platform for representatives from consumer interest groups to directly raise issues and concerns under the CRU's remit with the CRU.

receive feedback from. These Calls for Evidence are the initial step to engage with the market and consumers, however the CRU is aware that engagement through different means such as workshops, online surveys, questionnaires, and other potential platforms will be needed to ensure that the voice of the consumer is present while work progresses on framework development in this area.

All comments and views expressed through these many information gathering exercises will help form the basis for future Decisions being made by the CRU to develop a regulatory framework on this topic following the transposition of aspects of the Clean Energy Package.

As part of the process of preparing these papers, the CRU has developed a set of high-level principles to keep in consideration to ensure the organisations mission, values and goals are upheld. These principles are as follows:

- The CRU's approach is to enable consumers seeking to contribute to decarbonisation through participation in energy efficiency schemes, flexibility schemes or renewable electricity activities, such as self-generation, selling, sharing, or storage of self-produced electricity.
- The CRU will seek to facilitate the increased flow of information to educate consumers who are interested in managing their demand and participating individually, through a group or through aggregation in the electricity markets.
- The CRU will strive ensure that any regulatory frameworks developed with regards to active customers, renewable self-consumers, or jointly acting customers is constructed in such a way that it continues to ensure individual rights and high standards of protection for final customers and vulnerable customers.
- The CRU will ensure that the network, system operation and market costs associated with the provision of a reliable, safe and secure supply of electricity continue to be applied in a proportionate and non-discriminatory manner between final customers engaged and not engaged as active customers, renewable self-consumers and/or jointly acting customers.

The following sections provide a brief introduction to active consumer and jointly acting active consumers.

## **What is an active consumer?**

An *'active consumer'* is a term used being used by the CRU to jointly identify an *'active customer'* which is defined under the Electricity Directive<sup>2</sup> and *'renewable self-consumer'* as defined in the Renewable Directive<sup>3</sup> for the purpose of regulatory framework development prior to the transposition of the Directives of the Clean Energy Package into Irish Law. Active customers in the Electricity Directive can be summarised as individual customers or customers acting jointly on the same premises who partake in electricity activities such as generation, supply, storage or energy efficiency and flexibility schemes.

Renewable self-consumers as defined in the Renewable Directive can partake in many of the same electricity activities as active customers, however there are provisions in the Renewable Directive that state that renewable self-consumers should be compensated for excess electricity which is fed back into the grid and they may be charged in certain circumstances for some electricity activities.

Due to many of the overlapping rights, obligations and entitlements of these consumers, the CRU has considered that as means to progress implementation of the requirements in the Directives that they should be reviewed in tandem and a single regulatory framework could potentially encapsulate the activities of both types of consumers.

## **What is a jointly acting active consumer?**

Both the Electricity and Renewable Directive allow for joint participation by active customers and renewable self-consumers. However, this is under the stipulation that these customers must be in the same building or apartment block. This is the primary differentiation from these jointly acting consumers from being labelled as energy communities (which is being discussed in a separate Call for Evidence; CRU/20099).

These consumers that are acting together to undertake an electricity activity, such as generation, or energy-sharing are considered as jointly acting active consumers.

Each of the Directives allows for the Member States to apply differential treatment to these consumer groups as compared to individually acting active consumers where such treatment is proportional and duly justified.

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<sup>2</sup> Directive (EU) 2019/944 on common rules for the internal market for electricity

<sup>3</sup> Directive (EU) 2018/2001 on the promotion of use of energy from renewable sources

### **Are there already opportunities to be active customers?**

There is still extensive work to be undertaken to ensure that customers can avail of *all* the rights and entitlements outlined in the Electricity and Renewable Directive, however, there are some schemes currently active in Ireland which allow individual consumers to partake in some entitlements as outlined in the Directives.

For example, the national smart metering plan is in phase one and working to roll out smart meters for consumer and commercial use which would enable consumers to be more aware of their energy consumption and make informed decisions about energy saving practices. More existing active consumer schemes are further discussed in section 3.2 of this paper.

### **What initial considerations does the CRU have on active consumers?**

The CRU is committed to progressing implementation of the Directives to encourage active consumer participation in the electricity sector. Internal discussions have circulated around the benefits which could be achieved by increased active consumer participation such as more informed consumer decisions. The CRU believes that consumers who participate as active consumers will be more inclined to actively manage their energy consumption and can help make a difference in Ireland's decarbonisation efforts.

Furthermore, active consumers should eventually be able to participate in demand side response and flexibility schemes which should help the network operators alleviate system stress and allow for more renewable generation to be incorporated onto the system.

It is important that as participation levels increase in these areas that consumers are well-informed on what these new technologies are capable of and that they are comfortable enough to accept them into their homes, e.g. how does being an active demand responsive customer affect the customer's home life. As such, certain levels of transparency by network operators and other service providers will be expected as means to facilitate development in this area.

The CRU also is aware that there are further risks which will be involved with framework development around active consumers as some provisions in the Directives are relatively new concepts to Ireland. These involve considerations around third-party participation and aggregation in relation to their engagement with active consumers, as well as transparency rules and requirements which may be needed to develop energy sharing platforms.

Acknowledging these benefits and risks, the CRU notes that careful consideration will need to be given to introducing these new arrangements as we continue to evolve the regulatory

framework to meet our 2030 and longer-term ambitions. As such the CRU still expects to maintain high standards of consumer protections and to ensure that system stability is maintained following the introduction of these new entitlements and obligations for active consumers.

## CRU Mission Statement

The Commission for Regulation of Utilities (CRU) is Ireland's independent energy and water regulator. The CRU's mission is to protect the public interest in Water, Energy and Energy Safety. The work of the CRU impacts every Irish home and business. The sectors we regulate underpin Irish economic competitiveness, investment and growth, while also contributing to our international obligations to address climate change.

The CRU is committed to playing its role to help deliver a secure, low carbon future at the least possible cost, while ensuring energy is supplied safely, empowered and protected customers pay reasonable prices and we deliver a sustainable, reliable and efficient future for energy and water. The CRU is guided by four strategic priorities that sit alongside the core activities we undertake to deliver on the public interest. These are:

- Deliver sustainable low-carbon solutions with well-regulated markets and networks
- Ensure compliance and accountability through best regulatory practice
- Develop effective communications to support customers and the regulatory process
- Foster and maintain a high-performance culture and organisation to achieve our vision

Further information on the CRU's role and relevant legislation can be found on the CRU's website at [www.cru.ie](http://www.cru.ie).

## Executive Summary

This is one of two Calls for Evidence being published on topics relating to consumer empowerment under the Clean Energy Package. The second Call for Evidence (CRU/20099) deals with the participation of energy communities in the Irish electricity sector whereas the focus on this paper pertains to active consumers and jointly acting active consumers. These two types of consumer groups have many overlapping right and entitlements, but also enough unique aspects that the CRU was of the view that two separate papers were needed to address all the relevant topics.

Of the eight legislative files of the Clean Energy Package, two of the Directives contain provisions for the empowerment of individuals and jointly acting consumer groups. This is to be brought about through requirements on Member States to facilitate a framework that easily enables participation by these individuals and groups in electricity undertakings and in electricity markets.

Directive (EU) 2019/944 on common rules for the internal market for electricity<sup>4</sup> (the ‘Electricity Directive’) and Directive (EU) 2018/2001 on the promotion of the use of energy from renewable sources<sup>5</sup> (the ‘Renewable Directive’) both contain elements on consumer rights and empowerment through the promotion of use of electricity from renewable sources and encouragement for active participation in electricity markets.

The Electricity Directives introduces the concept of ‘*active customers*’ and similarly, the Renewable Directive defines ‘*renewable self-consumers*.’ Both consumer groups are provided certain entitlements, rights and obligations which are further outlined in each of the Directives. However, there is a considerable amount of overlap with regards to the electricity activities in which they can partake and on the provisions of fair and non-discriminatory treatment. As a result, the CRU has considered that in order to progress the implementation of the requirements pertaining to active customers and renewable self-consumers that they could be combined into a single workstream. As such, for the purpose of this publication, when jointly referring to active customers and renewable self-consumers, the term ‘*active consumer*’ will be used.

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<sup>4</sup> [Directive \(EU\) 2019/944](#) on common rules for the internal market of electricity

<sup>5</sup> [Directive \(EU\) 2018/2001](#) on the promotion of use of energy from renewable sources

This Call for Evidence is one channel which is being used to obtain feedback by industry participants, service providers and potential active consumers. The CRU may also consider surveys and engaging with consumer groups to obtain further views and insights which will be able provide benefit during this information gathering period and will influence how the CRU progresses framework development with regards to active consumers.

The purpose of this information gathering exercise is two-fold. Firstly, the information will support the CRU's engagement with DCCAIE on the transposition exercise. The information gathered through this process will allow the CRU to consider the long-term development of these concepts when advising the Department on the best approach to transposing the requirements of the Directive into Irish law. Secondly, the information gathered through this process, will allow the CRU to begin planning further work in these areas – based on transposition of the Directives into Irish law. However, it is important to stress, that the CRU will not necessarily be in a position to put in place new frameworks to support these new entities or types of participation in the absence of the vires to do so, being provided for through the legislation.

This paper is intended to initiate the conversation on active consumers with interested industry participants, service providers and potential active consumers to understand their initial interests and considerations on the topics and to present the CRU initial considerations with regards to active consumers.

It also aims to highlight the need for open communication between the regulator, industry and actual active customers. This communication and transparency are anticipated to lead to more informed consumers that will be aware of their actions and knowledgeable of new technologies that will eventually help shape the energy transition needed to obtain Ireland's decarbonisation goals.

The CRU is aiming to ensure that all interested consumers can undertake the electricity activities outlined in the Directives while facing proportionate and non-discriminatory procedures and practices. The entitlements in the legislation are to be aimed at everyday consumers who are willing to contribute to decarbonisation efforts in Ireland, and as such they will be engaged in activities which do not serve as their primary income and would be considered outside of the scope of their primary profession. This highlights the necessity of open communication and transparency in order to reduce the knowledge gap between service providers, industry and the willing active consumer.

Section 4 of this paper provides a series of considerations that the CRU has developed following its initial review of the legislation and following several internal discussions on the topic. The considerations have led to a series of questions which are provided in the table below.

No.	Question for Feedback
1	What consumer benefits do you see from enhancing participation by active consumers in the electricity sector?
2	What network/system benefits do you see from enhancing participation by active consumers in the electricity sector?
3	What electricity activities do you think will have the most uptake by active consumers? (e.g. generation, supply, energy sharing/trading, participation in energy efficiency schemes, participation in flexibility market, etc.)
4	What regulatory barriers currently exist that inhibit further development of active consumers in Ireland, and do you have any recommendations on alternative arrangements which could facilitate better development?
5	What current consumer rights may be at risk following the implementation of the requirements in the Directive?
6	Are the current schemes for active consumers easily accessible to all consumers (including low-income and vulnerable customers)?
7	What risks are there associated with applying the same treatment or differential treatment to individually acting and jointly acting active consumers?
8	Are there alternative organisational structures that would better enable development for jointly acting active customers (e.g. cooperatives)?
9	Do you have any initial considerations on how a peer-to-peer energy platform could be used to enable active consumer energy sharing and trading?
10	What types of services do you anticipate active consumers would be requesting of third parties? (e.g. installation, management, monitoring of operations, data exchange, etc).
11	What regulatory oversight should be applied to third-party service providers to ensure active consumers are protected against such risks as information asymmetry?
12	What types of updates to the current market arrangements are needed to enable aggregators to participate in Ireland's electricity sector independently of suppliers?
13	What types of flexibility services do you see active consumers being able to provide to system operators?

The CRU welcomes feedback on these questions as well as any other comments or suggestions market participants are willing to provide on the topic of active consumers and jointly acting active consumers. Responses may be submitted until 25 September 2020 and can be emailed to the Clean Energy Package Team at [CEPinfopapers@cru.ie](mailto:CEPinfopapers@cru.ie).

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# 1. Introduction

## 1.1 Background

The eight legislative files which comprise the Clean Energy for all Europeans Package (CEP) are currently being implemented in Member States throughout the EU. Of the eight legislative files, two of the Directives contain provisions for the empowerment of individuals and jointly acting groups. They require this through requirements on Member States to facilitate a framework that easily enables participation by these individuals and groups in electricity undertakings and in electricity markets.

Directive (EU) 2019/944 on common rules for the internal market for electricity<sup>6</sup> (the ‘Electricity Directive’) and Directive (EU) 2018/2001 on the promotion of the use of energy from renewable sources<sup>7</sup> (the ‘Renewable Directive’) both contain elements on consumer rights and empowerment through the promotion of use of electricity from renewable sources and encouragement for active participation in electricity markets.

The contents of the Directives are to be applied by Member States through transposition of the documents into national law. The Department for Communication, Climate Action and Environment (DCCAE) is responsible for the transposition, subject to input from the relevant regulatory bodies, such as the CRU. The deadline for the transpositions of the Electricity Directive and Renewable Directive are 31 December 2020 and 30 June 2021 respectively. Most of the articles in each of the Directives are to apply directly following the transposition of the documents.

Contained in the articles in each of the Directives are the requirements and obligations to facilitate participation by individual or jointly acting customers. These are defined as ‘active customers’ in the Electricity Directive and ‘renewable self-consumers’ in the Renewables Directive. For the purpose of this document, the CRU will use the term ‘active consumer’ when referring to both active customer and renewable self-consumers.

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<sup>6</sup> [Directive \(EU\) 2019/944](#) on common rules for the internal market of electricity

<sup>7</sup> [Directive \(EU\) 2018/2001](#) on the promotion of use of energy from renewable sources

## 1.2 Purpose of this Call for Evidence

The purpose of this document is to discuss the requirements, the rights, obligations, risks and other considerations for participation by active consumers in an Irish context. The CRU is interested in the thoughts from industry participants, potential service providers and potential active consumers around this topic to determine levels of interest as well as any concerns industry may have which might inhibit development in this area.

The CRU aims to involve as many participants as possible in the discussions on active consumers and energy communities and this Call for Evidence is one way that the CRU hopes to engage stakeholders to obtain their views on the subject. The CRU also plans to obtain consumer feedback through alternative means, such as through the Consumer Stakeholder Group<sup>8</sup>.

The complex nature of the topics on active consumers and energy communities means that the traditional ways that the CRU engages with stakeholders through Consultations and stakeholder events may not be suitable to reach all consumer groups the CRU would like to receive feedback from. These Calls for Evidence are the initial step to engage with the market and consumers, however the CRU is aware that engagement through different means such as workshops, online surveys, questionnaires, and other potential platforms will be needed to ensure that the voice of the consumer is present while work progresses on framework development in this area.

All comments and views expressed through these many information gathering exercises will help form the basis for future Decisions being made by the CRU to enhance the current regulatory framework to meet the criteria required under the Directives.

This specific information gathering exercise aims to achieve two goals. Firstly, the information will support the CRU's engagement with DCCA on the transposition exercise. The information gathered through this process will allow the CRU to consider the long-term development of these concepts when advising the Department on the best approach to transposing the requirements of the Directive into Irish law. Secondly, the information gathered through this process, will allow the CRU to begin planning further work in these areas – based

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<sup>8</sup> The Consumer Stakeholder Group (CSG) is comprised of groups and entities which engage with the CRU to discuss matters relating to consumer interests. These meetings occur quarterly and serve as a platform for representatives from consumer interest groups to directly raise issues and concerns under the CRU's remit with the CRU.

on transposition of the Directives into Irish law. However, it is important to stress, that the CRU will not necessarily be in a position to put in place new frameworks to support these new entities or types of participation in the absence of the vires to do so, provided for through the legislation.

This paper is intended to initiate the conversation on active consumers with interested industry participants, service providers and potential active consumers to understand their initial interests and considerations on the topics and to present the CRU initial considerations with regards to active consumers.

It also aims to highlight the need for open communication between the regulator, industry and actual active customers. This communication and transparency are anticipated to lead to more informed consumers that will be aware of their actions and knowledgeable of new technologies that will eventually help shape the energy transition needed to obtain Ireland's decarbonisation goals.

The CRU is aiming to ensure that all interested consumers can undertake the electricity activities outlined in the Directives while facing proportionate and non-discriminatory procedures and practices. The entitlements in the legislation are to be aimed at everyday consumers who are willing to contribute to decarbonisation efforts in Ireland, and as such they will be engaged in activities which do not serve as their primary income and would be considered outside of the scope of their primary profession. This highlights the necessity of open communication and transparency in order to reduce the knowledge gap between service providers, industry and the willing active consumer.

### **1.3 Structure of the Paper**

There are questions presented at the end of this paper which address the CRU's initial considerations on the topic of active customers and renewable self-consumers for which feedback is requested by interested stakeholders' and industry participants. However, the CRU welcomes any further comments beyond the answers to these questions with regards to these topics as this paper is intended to be an initial communication to open the discussion around development of active customers and renewable self-consumers.

The paper will be structured as follows:

- Section 2 will provide definitions from each of the Directives on active consumers and a brief description of the rights and obligations of each of the customer groups.

- Section 3 will highlight some existing arrangements and projects which could be considered to meet the objectives of consumer empowerment in the Directives.
- Section 4 will address some initial considerations and concerns the CRU has on the development of a framework around participation by active consumers, with a primary focus on regulatory barriers and customer protection.
- Section 5 outlines next steps to be taken by the CRU to progress with their assistance on the transposition of the Directives into Irish Law, and subsequently the development of a regulatory framework around participation by active consumers.

Please note that this paper has been published in parallel with a Call for Evidence/Information Paper on Energy Community Development. There is a significant amount of overlap on the two topics, however, the CRU is aware that certain stakeholders may only be interested in responding on one topic rather than both.

Respondents who seek to respond to both papers are kindly requested to submit two separate responses for each topic. Responses may be published to allow for information sharing between respondents on these topics, however any respondents who wish for their submissions to be kept private should mark their responses as confidential. Submissions are requested to be submitted by 25 September 2020 and may be submitted to the Clean Energy Package Team at [CEPinfopapers@cru.ie](mailto:CEPinfopapers@cru.ie).

## 2. Legislative Background

### 2.1 Electricity Directive

Active Customers are defined in the Electricity Directive as ‘a final customer, or a group of jointly acting final customers, who consumes or stores electricity generated within its premises located within confined boundaries or, where permitted by a Member State, within other premises, or who sells self-generated electricity or participated in flexibility or energy efficiency schemes, provided that those activities do not constitute its primary commercial or professional activity<sup>9</sup>.’

Article 15<sup>10</sup> of the Electricity Directive specifies the entitlements of active customers and outlines the electricity undertakings and schemes that these individuals or groups can participate in. Under this Article, Member States are to ensure that there is a framework enabling active customer participation in these activities.

The Electricity Directive requires that final customers can act as active customers without facing discriminatory or disproportionate technical and administrative requirements or procedures. Member States are to ensure that within their jurisdictions that active customers are:

- Entitled to operate directly or through aggregation in flexibility and energy efficiency schemes, and can sell self-generated electricity (including through power purchase agreements),
- Entitled to delegate responsibilities for management of installation, installation, operation, data handling and maintenance to a third party who is not considered an Active Customer;
- Subject to cost-reflective, transparent and non-discriminatory network charges which account separately for electricity consumed from and exported onto the grid, and
- Are financially responsible for any imbalances caused to the electricity system, such that they or a delegated party are balance responsible parties<sup>11</sup>.

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<sup>9</sup> [Article 2\(8\)](#) Definitions of Electricity Directive (EU) 2019/944

<sup>10</sup> [Article 15](#) Active Customers of Electricity Directive (EU) 2019/944

<sup>11</sup> [SEM-20-027](#) Information Paper on Balance Responsibility in the SEM

Further to these provisions, active customers who own energy storage facilities are to be facilitated with a right to a grid connection in a reasonable time frame (provided that all other necessary considerations for grid safety and market participation are in place), and are not subject to double-charges for stored electricity, or disproportionate licencing requirements.

The Electricity Directive also contains provisions for Member States to apply different treatments to jointly acting and individual active customers where such treatment is justifiable and proportionate.

## 2.2 Renewable Directive

Many of the provisions outlined in the previous section are echoed in the Renewable Directive under the descriptions and requirements outlined for renewable self-consumers. These customers are defined to be *‘a final customer operating within its premises located within confined boundaries or, where permitted by a Member State, within other premises, who generates renewable electricity for its own consumption, and who may store or sell self-generated renewable electricity, provided that for a non-household renewables self-consumer, those activities do not constitute its primary commercial or professional activity.’*

In addition to the definition for renewable self-consumers, the Renewable Directive also contains a definition on jointly acting renewable self-consumers., such that these customers are *a group of at least two jointly acting renewables self-consumers... who are located in the same building or multi-apartment block.*

Entitlements and obligations for these consumers are provided in Article 21 which states that renewable self-consumers

- can participate directly or through aggregation to generate renewable energy for their own use, to sell or store excess production (including through power purchase agreements) without facing disproportionate or discriminatory procedures and charges and/or non-cost-reflective network charges;
- can install and operate electricity storage facilities;
- are to maintain their rights and obligations as final customers;
- can receive remuneration (including through support schemes where applicable) for the self-generated electricity which is supplied to the grid which reflects the market value of that electricity; and
- can delegate the installation, management, maintenance, and/or operation to a third-

party that is not considered a renewable self-consumer.

Member States have the discretion to apply charges to renewable self-consumers if one or more of the following apply;

- The project is supported via a support scheme, and the charges are not so high as to undermine the economic viability of the project,
- The total installed capacity is over 30kW, or
- By 2026 if the share of self-generated renewable electricity in the Member State exceeds 8% total installed capacity in the region.

Similarly, to the Electricity Directive, Member States hold the discretion to apply different treatment to jointly acting renewable self-consumers and individual self-consumers where the difference in treatment is justifiable. However, under the Renewable Directive, Member States are to ensure that self-consumers located in the same building or apartment complex are entitled to sharing of electricity.

Further to just outlining the rights and obligations for renewable self-consumers, the article also details the minimum requirements for Member States regulatory frameworks around these types of consumers, stating that the regulatory framework shall

- address accessibility by *all* customers (including vulnerable and low income), unjustified regulatory barriers (including for tenants), and barriers to financing renewable self-consumption;
- grant access to relevant support schemes and market segments for renewable self-consumers;
- ensure that renewable self-consumers contribute in a balanced way to the overall cost-sharing of the system when excess electricity is fed into the grid (effectively requiring renewables self-consumers to be balance responsible).

## **2.3 Comparison**

There is a high amount of cross-over between the concepts of active customers and renewable-self consumers. The benefit of this overlap is that a single regulatory framework could be developed which could include provisions for both types of customers. The table below outlines the rights and requirements of active customers with regards to the two pieces of legislation.

Right/Requirement	AC	RSC
Right to:		
operate individually or through aggregation	X	X
generate on premises	X	X
generate off premises	Member State discretion	Member State discretion
sell excess production	X	
store excess production	X	X
participate in flexibility and energy efficiency schemes	X	
receive remuneration for electricity fed into the grid		X
delegate installation and maintenance to third-party	X	X
cost-reflective network charges	X	X
No disproportionate or discriminatory		
technical requirements	X	X
discriminatory administrative requirements	X	X
licencing procedures or fees	X	X
Financially responsible for imbalances caused to the electricity system	X	X
Install electricity storage systems on premises	X	X
Be charged (under certain criteria) for generation		X

There are some differences in the way that active customers and renewable self-consumers can behave as highlighted in this table, such as the fact that the Renewable Directive calls for renewable self-consumers to be compensated for the electricity they feed into the grid, whereas there's no such requirement for active customers in the Electricity Directive. This does highlight an important note that, although active customers and renewable self-consumers can be analysed jointly for the purpose of regulatory framework development, they are in fact separately defined consumer groups and the future regulatory framework will take these differences into consideration.

In addition to these rights and obligations for individual consumers, both Directives allow for participation by jointly acting active consumers where they are located within the same building or apartment block. It grants the Member States the discretion to apply differential treatment where it is justified, however the jointly acting consumers should be able to participate in all activities and schemes which are provided in the table above and any costs should be proportionate to the undertaken activity.

Moreover, energy sharing, and trading is to be allowed between jointly acting active consumers, which places additional considerations upon the development of a framework for

these types of customers, as activities related to sharing of energy may require different regulatory oversight than activities conducted solely by an individual active consumer.

## **3. Active Customers in Ireland**

### **3.1 Principles for Active Customers**

While there is not currently an explicit definition for active customers or renewable self-consumers in Ireland presently, there are activities being conducted by individuals which could be considered under the umbrella of active customer or renewable self-consumer activities. These include customers actively engaging in demand side management through the installation of smart meters, or through self-generation of renewable electricity through participation in microgeneration.

The CRU is aware that there is an increasing interest by market participants and individuals to expand upon these already existing arrangements to develop innovative projects pertaining to other activities outlined in each of the Directives, such as energy sharing and/or trading, the ability to act as jointly acting active consumers through the generation and sharing of energy throughout apartment buildings, and active participation in electricity markets through the use of an aggregator.

The CRU is also cognisant of the fact that the current regulatory regime could potentially be seen as a barrier to the development of these projects and that future updates to the current framework may need to be incorporated to develop a proportional and non-discriminatory set of rules around the governance and establishment of these ventures.

A set of high-level principles has been developed to convey the overarching goals which the CRU expects to maintain while developing new and updating existing frameworks for the purpose of the incorporation of active consumers and jointly acting active consumers into Ireland's electricity sector. These high-level principles are as follows:

- The CRU's approach is to enable final customers seeking to contribute to decarbonisation through participation in energy efficiency schemes, flexibility schemes or renewable electricity activities, such as self-generation, selling, sharing, or storage of self-produced electricity.
- The CRU will seek to facilitate the increased flow of information to educate final customers who are interested in managing their demand and participating individually, through a group or through aggregation in the electricity markets.

- The CRU will strive ensure that any regulatory frameworks developed with regards to active customers, renewable self-consumers, or jointly acting customers is constructed in such a way that it continues to ensure individual rights and high standards of protection for final customers and vulnerable customers.
- The CRU will ensure that the network, system operation and market costs associated with the provision of a reliable, safe and secure supply of electricity continue to be applied in a proportionate and non-discriminatory manner between final customers engaged and not engaged as active customers, renewable self-consumers and/or jointly acting customers.

Working within these principles the CRU will fully work on developing a regulatory framework to facilitate innovation and development to enable active consumers and jointly acting active consumers to participate in the energy transition envisaged in the Clean Energy Package. This framework will be developed in line with the mission of the CRU, such that it is anticipated that there will remain a high level of consumer protection, and no diminution of system security.

## **3.2 Existing Arrangements**

As mentioned in the previous section, there are already frameworks in place to enable some forms of active consumer participation in the electricity sector in Ireland. There are further activities which have not been defined or thoroughly regulated before, however the activities mentioned below provide a brief background of the existing policies that were developed to encourage consumer participation in the electricity sector.

### **3.2.1 Smart Metering**

Smart metering trials in Ireland demonstrated that Irish customers acted on better information to reduce energy consumption overall and responded to price signals to move energy consumption to off-peak hours. The design of the smart services policies are intended to facilitate active consumers in benefiting from lower costs while supporting decarbonisation.

Smart meters are capable of measure a customer's electricity import and export and can provide customers with accurate information about their energy usage throughout the day. The National Smart Metering Programme (NSMP) is the delivery plan for the roll out of smart meters across Ireland. This plan is divided into phases, with the first phase beginning back in September 2019 which aims to have ESB Networks install 250,000 smart meters across Ireland throughout 2019 and 2020. The following four years hope to see 500,000 meters installed annually.

These meters will replace the current analogue electricity meters, which must be manually read

by ESB Networks and do not have the capability of measuring exported electricity. New smart meters will have the ability to provide customers with smart services, such as time-of-use tariffs, smart bills and access to historical consumption.

The second phase is expected to occur in 2021-2022 and will introduce further services such as Smart prepayment (or smart pay-as-you-go) towards the end of the phase. This will enable consumers the ability to pay up-front for their energy without the need for an additional meter or device in their home. Furthermore, in the third phase (2023-2024) customers will be able to access real-time data on their household energy usage via a device in their home.

The CRU views the NSMP as a route to facilitate active consumer participation in the electricity sector. The introduction of a smart meter in a consumer's home provides them the ability to monitor their electricity usage on 30-minute intervals and allows them actively manage their demand according to market-price based incentives.

Additionally, these meters enable customers to monitor how much of their generated electricity is exported back onto the grid and this then feeds into additional policies which are currently being developed by the DCCAE, with support from CRU, on compensation for exported electricity.

### **3.2.2 Microgeneration**

The CRU first published a Decision Paper in 2007<sup>12</sup> setting out the technical parameters for the definition of microgeneration for grid connection purposes. It clarified a source of electrical energy designed to operate in parallel to the low voltage distribution system and rated up to;

- 6kW of installed capacity, when the DSO network connection is single phase; and
- 11kW of installed capacity, when the DSO connection is three phase.

Most domestic dwellings in Ireland are single phase, with a voltage of 230 Volts. However, some commercial premises and farms may have a three-phase supply with a voltage either at 230 or 400 Volts. Further information and explanation on these definitions can be found on the ESB Networks site<sup>13</sup>.

Recently the CRU published a Microgeneration Information Paper<sup>14</sup> which outlines the areas of work being progressed by the CRU to support microgeneration uptake based on the specific

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<sup>12</sup> [CER/07/208](#) Arrangements for Micro Generation

<sup>13</sup> Further information on ESB Networks Microgeneration Governance can be found through this [link](#).

<sup>14</sup> [CRU/20059](#) Microgeneration Information Paper

CRU actions identified in the Climate Action Plan<sup>15</sup> and as part of the Electricity and Renewable Directives.

Under the Climate Action Plan Annex of Actions<sup>16</sup>, the CRU was called upon to develop a settlement scheme for resolving market settlement issues for active consumers who are exporting to the grid and determination of an appropriate grid connection policy to facilitate active consumers. The CRU partakes in a Microgeneration working group alongside other governing bodies. This working group was established under the Retail market governance framework to finalise the settlement approach for microgeneration for an interim period until such time and enduring solution which can incorporate smart technologies is in place.

Prior to the development of these schemes, the current conditions in Ireland have led to limited tariff offerings by suppliers which encouraged microgeneration uptake through support schemes. However, some suppliers have shown further interest in developing these tariffs as the framework on microgeneration and active consumers progresses.

In terms of providing financial support to customers seeking to engage in these activities, the Sustainable Energy Authority of Ireland (SEAI) currently provides grants for the installation of up to 2kW of solar PV installation and up to 4kW of solar PV and battery installation.

### **3.2.3 Energy Storage**

The Directives each outline provisions with respect to rights to be maintained by individuals who participate in energy storage schemes. Currently, in Ireland, residential storage is primarily limited to storage of on-site generation from solar PV panels on consumer's premises. SEAI has grants in place to assist customers looking to install a battery on their premises where they also install solar PV.

Additionally, several suppliers are offering to install batteries for customers where they have or are considering installing solar PV. They aim to enable customers to adjust the way they manage and control their energy consumption, but experience in other jurisdictions suggests that these batteries may in time be centrally operated by the supplier in the wholesale market.

Commercial businesses are currently provided more advanced services with regards to energy storage which could be reviewed to see if these smart services could be scaled down for individual use and residential properties. With the advancement and increase in

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<sup>15</sup> [Climate Action Plan](#)

<sup>16</sup> Climate Action Plan Annex of Actions – [Microgeneration](#)

consumption and export data expected from the installation of smart meters, it's expected that smart services in relation to energy storage will also increase in volume. These advances will be taken into consideration when creating the framework around active consumers.

### **3.2.4 Demand Side Response**

Demand Side Units (or DSUs) are market participants in Ireland which pool consumer generation loads for the purpose of providing demand response services to the transmission system operator to reduce system demand or to relieve constraints on the system by reducing consumption and demand from their pooled constituents.

DSUs hold a supply licence for the purpose of participating in the Single Electricity Market (SEM), and their consumption loads are primarily made up of commercial and industrial participants which usually have larger demand requirements as compared to individual consumers and thus can contribute more to reducing system demand.

Demand side participation by active consumers, however, is to be encouraged by the Member States as per the Electricity Directive which states in Recital 37, that '*Consumers should have the possibility of participating in all forms of demand response*<sup>17</sup>.' This is further expanded on in Article 17 of the Electricity Directive which calls for consumer participation in demand response through aggregation.

The CRU is currently investigating potential forms of aggregation already in existence in the SEM and will further consult on this topic with regards to demand side participation through aggregation in Q3 of 2020. However, it is important to note that some larger-scale participation in demand response is already occurring in Ireland. The CRU will explore opportunities to scale these activities accordingly to allow participation by active consumers and jointly acting consumers.

The CRU's current expectation is that residential demand response should not look too dissimilar from larger-scale demand response, but is likely to leverage off smart metering solutions, or supplier-installed monitoring equipment.

### **3.2.5 Energy Efficiency Schemes**

Many home energy efficiency schemes are run by SEAI. These schemes provide grants for consumers to be able to engage in every saving activities or renewable generation.

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<sup>17</sup> [Recital 37](#) of Directive (EU) 2019/944

Furthermore, SEAI also provides support to individuals receiving certain social welfare payments through free energy upgrades for eligible homes.

While important areas of active-consumption management, these are outside the CRU's remit, and does not foresee any activity in these areas.

### 3.2.6 Summary of Schemes

<b>Electricity Activity</b>	<b>Current Scheme in Place</b>
<b>Participation through aggregation</b>	Participation through a DSU for commercial customers and large energy users
<b>Generation</b>	Microgeneration Framework
<b>Sell excess production</b>	Payment scheme for excess generation being developed by DCCAE (with input from CRU).
<b>Store excess production</b>	Schemes in place to store excess electricity from solar generation on residential properties.
<b>Participate in Flexibility Schemes</b>	No active service, though trial projects are being run by ESN Innovation Teams
<b>Participate in Energy Efficiency Schemes</b>	SEAI has several energy efficiency schemes and grants available for active consumers.
<b>Receive remuneration for electricity fed into the grid</b>	Payment scheme for excess generation being developed by DCCAE (with aid from CRU).
<b>Hire third-party management for installation and maintenance</b>	Retail suppliers usually assist or run the installation of solar PV and batteries. ESN oversees installation of Smart Meters.
<b>Install electricity storage</b>	Batteries can be installed on residential premises, commonly done when installing solar PV.
<b>Energy Sharing/Trading</b>	No scheme currently in place.
<b>Participation as a jointly acting consumer</b>	No scheme currently in place

## 4. Call for Evidence on Active Consumers

Although there is already a considerable framework in place in Ireland that enables forms of active consumer participation, the CRU is conscious that there is further development needed to ensure the rights and requirements outlined in the Directive are accurately implemented in Ireland.

The areas of work in the CRU impacted by these topics is cross-cutting across all areas of Retail and Smart Metering, Wholesale Electricity Markets, Electricity Networks, Customer Care and Compliance and Enforcement. The CRU has internally discussed key areas of these topics with members of these various teams as means to understand the different considerations which must be upheld when developing new frameworks. These internal discussions have led to the considerations outlined in the following sections.

As noted, the purpose of this paper is to obtain industry feedback on the CRU's initial considerations on active consumers, as well as any other initial comments or thoughts that stakeholders might have on these topics which may benefit the CRU in the framework development process. The following sections highlight the various topics which have been identified through internal discussions and will provide the basis for which feedback is requested by interested participants.

### 4.1 Considerations

#### 4.1.1 Consumer Benefits

The following areas were identified as possible opportunities of more active consumers,

- More informed consumer decisions concerning consumption and demand side management;
- Individual contribution to decarbonisation efforts and climate change objectives;
- Increased awareness and responsiveness to market prices especially during peak demand time periods;
- Increased roles for consumers to provide flexibility services;
- Higher social acceptance of new electricity technologies which can contribute to cost savings;
- Increased participation by individuals in the electricity markets; and
- An enhanced framework which has the potential to lower barriers to entry for market participants.

The CRU is interested in stakeholders' thoughts on their initial perceptions on the benefits of increased active customer participation and comment on the potential benefits listed above. The CRU particularly invites comments on the following question.

**Question 1**

What consumer benefits do you see from enhancing participation by active consumers in the electricity sector?

**4.1.2 Network and Grid Benefits**

The following bullet points highlight potential systems benefits which may be obtained through higher active consumer participation:

- Increased number of households and properties being able to provide flexibility services to the network operators;
- Creates unforeseen opportunities for innovative projects; and
- Lower levels of system stress at the distribution level.

The CRU is aware that there could be further systems benefits that could be achieved through increased active consumer participation, and as a result raises the following question.

**Question 2**

What network/system benefits do you see from enhancing participation by active consumers in the electricity sector?

**4.1.3 Potential activities**

As set out in Section 3, the CRU has initially identified at a high level several areas where active consumers are operating, and where a regulatory framework is already in place to some extent.

The CRU is interested to hear back from stakeholders, and particularly from prospective active customers on specifically what other types of activities they would be interested in engaging in. The CRU is cognisant of the fact that the activities we think consumers might be most interested in, may not match stakeholders' thoughts on the subject.

**Question 3**

What electricity activities do you think will have the most uptake by active consumers? (e.g. generation, supply, energy sharing/trading, participation in energy efficiency schemes, participation in flexibility market, etc.)

**4.1.4 Barriers and Restrictions**

The current regulatory regime may not be suitable for participation in the electricity sector by individual consumers or small groups of jointly acting consumers. Many of the licencing procedures and contractual requirements are more suited for industry participants with sufficient resources and technical knowledge that enables them to navigate the process needed to obtain the necessary permissions to be able to conduct their electricity activity.

The Directives call for licencing requirements, processes and procedures to be proportionate and non-discriminatory of active consumers, and as such, the CRU is cognisant of the fact that the current requirements needed to generate, share or supply electricity may be challenging for individuals or small consumer groups to obtain.

Further to this acknowledgement, however the CRU is also aware that there may be other regulatory barriers that make it challenging for innovative projects to be developed and as a result the CRU would like to ask the following question to participants.

**Question 4**

What regulatory barriers currently exist that inhibit further development of active consumers in Ireland, and do you have any recommendations on alternative arrangements which could facilitate better development??

**4.1.5 Maintenance of Consumer Protections**

One of the main priorities of the CRU when developing new regulatory frameworks such as these is the maintenance of consumer protections. This is highlighted in Section 3.1, as one of the main principles the CRU has identified pertains to ensuring individual rights and high standards of protection for final customers and vulnerable customers are maintained.

The following questions are designed to gain a high-level understanding of stakeholders' current understanding of consumer rights and whether they feel that these rights could be affected by future development in frameworks around active consumers.

**Question 5**

What current consumer rights may be at risk following the implementation of the requirements in the Directive?

**Question 6**

Are the current schemes for active consumers easily accessible to all consumers (including low-income and vulnerable customers)?

#### **4.1.6 Jointly acting active consumers and energy sharing**

As mentioned in previous sections, Member States can apply differential treatment to jointly acting active consumers where it is proportionate and justifiable. Following initial considerations, the CRU is aware of the fact that there may need to be different rules around jointly acting consumers to ensure that the individuals who are acting as part of a group maintain their individual rights, and/or are aware of the conditions which may require them to waive certain rights to participate as part of a group of jointly acting active consumers.

There have already been some queries received by the CRU in relation to cooperative arrangements and the CRU is currently investigating this type of arrangement and whether it can be applied in the context of jointly acting active consumers, and additionally what implications this has on individual consumer rights.

Moreover, the Directives outline that jointly acting active consumers should be able to share energy amongst the group or trade via peer-to-peer trading platforms. The CRU is aware that there are already some projects in Ireland that are experimenting with the physical sharing of energy on an industrial level, however with regards to peer-to-peer energy for individuals there are further aspects of customer protection which must first be investigated before these types of platforms are allowed to operate. With regards to jointly acting active consumers and energy sharing, the following questions seek to clarify what activities might develop in time, and how such new entities might be regulated.

**Question 7**

What risks are there associated with applying the same treatment or differential treatment to individually acting and jointly acting active consumers?

**Question 8**

Are there alternative organisational structures that would better enable development for jointly acting active customers (e.g. cooperatives)?

**Question 9**

Do you have any initial considerations on how a peer-to-peer energy platform could be used to enable active consumer energy sharing and trading?

**4.1.7 Third party management**

Many of the activities which active customers will be engaged in have not been fully defined in Irish legislation, rather they've been developed and adapted from previous existing arrangements for market participants. An example of this can be seen in the requirement for DSUs to hold an adapted version of a supply licence rather than being subject to a unique form of regulatory oversight.

Furthermore, existing supplier entities are taking the opportunity to provide services to customers which originally were not considered when developing their licences, such as the supplying of energy management devices and batteries for energy storage.

As a result, existing market participants are providing services to customers which could constitute as third-party management services as described in the Directives, however the current regulatory regime does not account for some of these types of activities. While there is regulatory oversight in some form for these market participants, it is not necessarily thoroughly defined to apply to the context of active consumers and third-party management.

The market for third-party participation in the electricity sector is anticipated to grow alongside the increase in active consumer participation. It is expected that active customers and jointly acting customers would seek out service providers to manage the installation of the energy project and potentially monitor the operation of the undertaking.

This raises the risk of asymmetric information between service providers which are currently subject to limited regulatory oversight and active consumers. The CRU aims to ensure that as this market develops that there are enough protections in place to increase the transparency of data flows and enough communication between service providers and consumers to encourage well informed decisions on these new technologies to be taken by the consumer.

With regards to the third-party market, the CRU requests feedback on the following questions.

**Question 10**

What types of services do you anticipate active consumers would be requesting of third parties? (e.g. installation, management, monitoring of operations, data exchange, etc).

**Question 11**

What regulatory oversight should be applied to third-party service providers to ensure active consumers are protected against such risks as information asymmetry?

**4.1.8 Aggregation**

There are further requirements outlined in the Electricity Directive which require the development of a framework for aggregators. These market participants act similarly to DSUs who pool multiple consumer generation loads for the purpose of participating in electricity auctions or in the electricity markets.

A primary entitlement for aggregators acting in the retail markets is the ability to contract with an active consumer, jointly acting active consumers, or energy communities independently of the consumer's supplier. This entitlement allows the active consumer to hold a supply contract and aggregation contract from two different providers without either entity being restricted from performing their services.

The SEM Committee is currently consulting on aggregators' access to the electricity markets<sup>18</sup> with a focus on the wholesale aspects. However, following the close of this consultation the CRU will assess the SEM Committee Decision and issue a further consultation as necessary on the development of aggregation for demand response and retail market participation in Ireland.

This future consultation will be able to help conceptualise the changes needed in the to comply with the requirements for an aggregation framework as outlined in the Electricity Directive. This paper, though, raises the following initial questions with respect to aggregator participation in the electricity market

**Question 12**

What types of updates to the current market arrangements are needed to enable aggregators to participate in Ireland's electricity sector independently of suppliers?

**4.1.9 Energy Efficiency and Flexibility Schemes**

Energy efficiency schemes and flexibility schemes can take many forms and it is challenging to consider all the potential innovative strategies which could be developed and provided to

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<sup>18</sup> [SEM-20-042](#) Consultation on Aggregation

active customers for the purpose of reducing their energy consumption and saving on costs, and furthermore aiding in the management of system stress at the distribution level.

As noted, many energy efficiency schemes are outside the remit of the CRU and are developed and progressed by entities such as the SEAI. As such, the CRU does not anticipate much regulatory development in these areas.

With regards to flexibility schemes however, the CRU does anticipate this to be a growing area of interest for both market participants and network operators. There is a considerable amount of work being done by EirGrid on the future arrangements on the DS3 programme which are expected to include new markets on flexibility. These new markets may require new technologies to be installed on on-site, and further developments may be targeted at changes to consumption patterns on individual consumers' premises. These impact of these changes on an individual's consumption might even be miniscule enough that the customer would not even be aware of their activation.

At this point, the CRU is primarily interested in stakeholders' views on potential developments with regards to flexibility markets and future arrangements on DS3.

**Question 13**

What types of flexibility services do you see active consumers being able to provide to system operators?

## 4.2 Summary

The CRU is highly interested in the views of stakeholders and industry participants with regards to the topics of active consumers and jointly acting active consumers. These initial considerations and concerns have been provided in this format to initiate the discussion on the topic outside of the CRU's internal discussions.

The topics which participants can provide feedback is not limited to the questions provided in this paper, but rather open to any further comments on the topics of active customers as described in the Electricity Directive and renewable self-consumers and jointly acting renewable self-consumers as discussed in the Renewable Directive.

The table below consolidates the questions from the previous section for which feedback is requested by interested stakeholders and industry participants.

<b>No.</b>	<b>Question for Feedback</b>
1	What consumer benefits do you see from enhancing participation by active consumers in the electricity sector?
2	What network/system benefits do you see from enhancing participation by active consumers in the electricity sector?
3	What electricity activities do you think will have the most uptake by active consumers? (e.g. generation, supply, energy sharing/trading, participation in energy efficiency schemes, participation in flexibility market, etc.)
4	What regulatory barriers currently exist that inhibit further development of active consumers in Ireland, and do you have any recommendations on alternative arrangements which could facilitate better development?
5	What current consumer rights may be at risk following the implementation of the requirements in the Directive?
6	Are the current schemes for active consumers easily accessible to all consumers (including low-income and vulnerable customers)?
7	What risks are there associated with applying the same treatment or differential treatment to individually acting and jointly acting active consumers?
8	Are there alternative organisational structures that would better enable development for jointly acting active consumers (e.g. cooperatives)?
9	Do you have any initial considerations on how a peer-to-peer energy platform could be used to enable active consumer energy sharing and trading?
10	What types of services do you anticipate active consumers would be requesting of third parties? (e.g. installation, management, monitoring of operations, data exchange, etc).
11	What regulatory oversight should be applied to third-party service providers to ensure active consumers are protected against such risks as information asymmetry?
12	What types of updates to the current market arrangements are needed to enable aggregators to participate in Ireland's electricity sector independently of suppliers?
13	What types of flexibility services do you see active consumers being able to provide to system operators?

## 5. Next Steps

The CRU is involved in several workstreams on the implementation of the requirements of the Directives into Irish law. This includes engaging with the DCCAE on the transposition of each of the pieces of legislation, but also conducting internal reviews on already existing frameworks and considering the development of new frameworks.

This paper is designed to initiate communication with stakeholders on the topic of active customers and renewable self-consumers, and as a result, the feedback provided on the questions will form the basis for the CRU's engagement with DCCAE on the transposition exercise, and further Consultations as necessary to ensure implementation of the new requirements.

As noted, this is only one form of communication which the CRU will be initiating with regards to the topics of energy communities and active consumers. These are complex areas and the CRU understands that the regulatory framework in this area will affect everyone from individual consumers to service providers. As such, the CRU will strive to engage with as many participants, including both individuals and industry participants, as possible to gather enough feedback needed to determine the best approach to applying a regulatory framework on these topics. These engagements are anticipated to take many forms, such as surveys, workshops and other alternative means. The CRU aims to make sure that the consumer voice is present while work progresses on framework development in this area.

In the CRU's published Roadmap on the CEP Electricity and Renewable Directives<sup>19</sup> a Consultation on the development of a framework on the topic of active consumers was planned for Q4. It is anticipated that feedback on this paper and other engagements will contribute to the basis of that Consultation.

Again, this paper has been published alongside a Call for Evidence on Energy Communities. Respondents who seek to respond to both papers are requested to submit separate responses for each topic. Responses may be published to allow for information sharing on these topics, however any respondents who wish for their submissions to be kept private should mark their responses as confidential. Submissions are requested to be submitted by 25 September 2020 and may be submitted to the Clean Energy Package Team at [CEPinfopapers@cru.ie](mailto:CEPinfopapers@cru.ie).

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<sup>19</sup> [CRU/20043](#) Roadmap for the Clean Energy Packages Electricity and Renewables Directives