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|--------------------------------|----------|-----------------|--|--------------------|------------|
| Discussion Request 1206 | | | Covid19 Supply Suspension Process | | |
| Status | Approved | Priority | Fast Track | Status Date | 24/04/2020 |

| Date | Version | Reason for Change | Version Status |
|------------|---------|--------------------------|----------------|
| 22/04/2020 | 0.1 | Draft – Issued to Market | Draft |
| 23/04/2020 | 1.0 | Issued to Market | Final |

| Part 1 DETAIL OF DISCUSSION REQUEST / MARKET CHANGE REQUEST | | | |
|---|----------------|---------------------------------|-----|
| Requesting Organisation(s) | ESB Networks | Originating Jurisdiction | Rol |
| Request Originator Name | Siobhan Melvin | | |
| Date Raised | 20/02/2020 | | |

| Classification of Request | | | |
|--|----------------------|--|--------------|
| Jurisdictional Applicability | Rol | Jurisdictional Implementation | Rol Specific |
| If jurisdictional implementation is for one jurisdiction only – is the other jurisdiction required to effect any changes? | No | Co-Ordinated Baseline Version No. | TBC |
| Change Type | Non-Schema Impacting | | |

| Detail of Request |
|---------------------------|
| Reason for Request |

Background

The **CRU Decision Paper Covid-19 Supply Suspension due to Temporary Closure** sets out the obligations on Market Participants to assist SME customers during the Covid19 pandemic.

The scope of this DR is limited to that of the CRU paper referenced above i.e. DG5, DG5B, DG6, DG6B, and the market process to comply with the CRU decision. Suppliers should complete their own impact assessments on how the CRU decision impacts their own internal processes and customer billing.

The DR sets out the market process for

1. Reducing estimated readings used for DUoS billing and Data Aggregation/ Settlement and
2. Crediting distribution network charges i.e. crediting the Standing Charge and Capacity (MIC) charges to suppliers for eligible MPRNs

This process is limited to the period of the Covid19 Supply Suspension Period as set out by the CRU and will not be used outside of this period or for any other purpose. The process is pragmatic reflecting the necessity for a speedy implementation and the expected temporary nature of the exceptional situation. If the Supply Suspension is to be for a prolonged period, then the proposed approach will need to be revisited.

The scheme will commence on 1st May 2020 and will apply for a period of 90 calendar days. Between the 29th and 30th April suppliers can submit MPRNs for validation to ESNB.

Proposed Solution

As per the **CRU Covid-19 Supply Suspension due to Temporary Closure decision** the obligation is on the registered supplier to engage with the customer and assess eligibility for the Supply Suspension Scheme in line with the qualifications set out in the decision paper. The onus is on the supplier to retain proof of consent from the customer.

1. Submission of 210MM Customer Read

- 1.1. To help ensure accuracy of data submitted for Settlement it is desirable, where possible and consistent with Government Public Health Measures, that the supplier obtains a customer reading for NQH non-MD sites and submits the read via the 210MM. A customer read should be obtained for NQH non-MD sites only, it is not required for NQH MD or QH sites.
- 1.2. The 210MM should be sent once the customers consent has been obtained and in advance of the Supplier File containing the MPRN being submitted to MRSO.
- 1.3. Suppliers are encouraged to continue to submit customer reads during the Supply Suspension Period. Please see 'Points to Note' for further information on readings received that indicate consumption during the Covid19 Supply Suspension Process (CSSP).

2. Submission of Supplier File

- 2.1. Customer consent must be obtained by the supplier before an MPRN is sent to ESBN for processing. MPRNs included in error by a supplier and processed by ESBN cannot be reversed or undone.
- 2.2. Suppliers should nominate two point of contacts for the purpose of this process and ideally a team mailbox should be used for sending files.
- 2.3. In advance of sending the first file the supplier must request a password from MRSO. This password will be used for the duration of the CSSP.
- 2.4. The supplier will submit no more than one file per day to MRSO. Suppliers only need to submit an updated file if new MPRNs have been added or where the CSSP is to be ceased for MPRNs previously included in the CSSP (see 5.2 for more information on CSSP Cessation).
- 2.5. The supplier file must be received by MRSO by 12.00 midday on a Working Day.
- 2.6. Where a supplier uses multiple Supplier IDs a separate file must be submitted for each Supplier ID in use; a consolidated file for multiple Supplier IDs is not permissible and will be returned unprocessed.
- 2.7. The file must be emailed to MRSO@esb.ie. Files sent directly to MRSO personal email addresses will not be processed
- 2.8. The email subject should contain "CSSP – SXX" with SXX being the Supplier ID.
- 2.9. Suppliers can continue to submit files up **until 12 midday 29th July 2020**.
- 2.10. Files will not be processed for a retrospective date.

3. Supplier File Format

3.1. Suppliers must use the file format provided by ESBN.

- 3.2. The supplier will maintain a single file containing all eligible MPRNs, new MPRNs must be added to end of the same file.
- 3.3. The file must be in CSV format.
- 3.4. The file must be password protected using the password provided by MRSO when sending the file to MRSO.
- 3.5. The file name must be in the following format; 'CSSP YYMMDD Supplier ID Supplier Name'. The date contained in the file name must be the date on which the supplier is submitting the file to MRSO.
- 3.6. The file must contain the following information (see template)
 - 3.6.1. **1st column 'MPRN'**
 - 3.6.2. **2nd column; 'Date Added to File'**. This is the date the MPRN was added to the file in the format DD.MM.CCYY
 - 3.6.3. **3rd column 'MM210 (Y/N)'**. This column indicates whether a Customer Read was obtained at the start of the CSSP application process and submitted via a 210MM. The supplier file should record Y/N.
 - 3.6.4. **4th column 'Customer Consent Obtained (Y/N)'**. This indicates whether the customer consent was obtained or not. The supplier file should record Y/N.

3.6.5. 5th column 'Cessation Request Date'. Where a customer is no longer eligible for the scheme due to a direction from CRU, which may come about due to the lifting of government restrictions in stages and/ or by sector, then the supplier must populate a date in the Cessation Request Date column. The date should be the date the supplier submits the request to ESN. This date will be used for audit purposes. ESN will effect the cessation on the date the file is processed rather than the supplier populated date. The date must be entered in the in the format DD.MM.CCYY. See 5.2 CSSP Cessation for more information. Please note once the supplier enters *any* text into the 'Cessation Request Date' field ESN will take it as a request to cease the CSSP for the MPRN and will proceed with the cessation request.

4. Supplier File Validation

- 4.1. The following validation will be conducted on each MPRN received from a supplier
 - 4.1.1. The MPRN is a valid MPRN
 - 4.1.2. the MPRN must be one of the following DUoS Groups; DG5, DG5B, DG6, DG6B.
 - 4.1.3. the MPRN must be registered to the supplier submitting the request
 - 4.1.4. a Change of Supplier must not be in progress
 - 4.1.5. there must have been at least one plausible actual read within the previous 12 months
 - 4.1.6. the supplier must have indicated that they obtained the customers consent

5. Supply Suspension Period

- 5.1. CSSP Effective Date
Updates to the EUF and Default Periodic Consumption will be effective as at the processing date of the file by ESN. ESN will also use this date as the valid from date for the Standing and Capacity (MIC) charge waiver.
- 5.2. CSSP Cessation
The scheme will run for 90 calendar days from the 1st May 2020. However, should the Government lift restrictions in stages and/or by sector then some customers may cease to be eligible for the scheme at that point. Where this occurs, the registered supplier must notify ESN in a timely manner once the supplier becomes aware that the MPRN is no longer eligible due to government restrictions no longer applying to the site. The supplier should populate the 'Cessation Request Date' in the CSSP Supplier File. The date populated must be the date the supplier requests the cessation and must not be a retrospective date or a future date. Cessation will be effective on the processing date by ESN. For all other MPRNs the CSSP will automatically end on the 29th July.

6. Reducing Estimates used for DUoS billing and Data Aggregation/ Settlement

- 6.1. Actual Usage Factor (AUF)
If a 210MM was received at the commencement of the CSSP and has been successfully processed and accepted by ESN then as per existing processes an AUF will be created up to the date of the reading provided on the 210MM. In the event, that an AUF is not available for the effective date, then ESN will create a 'Covid19' (CV19) AUF that is equivalent to the current EUF and then create CV19 EUF setting it to zero (No 300MM will issue). If a plausible actual read is subsequently received during the suspension period, it will overwrite the CV19 AUF with a new AUF that will span the same period i.e. between the last settlement-relevant read and the current read (i.e. normal consumption period and reduced Covid19 suspension period combined). The EUF that is now generated will be equal to the AUF and because the AUF also accounts for the period prior to the suspension period, it is likely that that the EUF generated is for a value greater than zero. ESN will conduct a daily check for this scenario and will reset the EUF to zero.
- 6.2. Estimated Usage Factor (EUF)
Once the AUF has been inserted as set out above the EUF for each Time of Use at an MPRN will be reduced to zero.
- 6.3. Default Periodic Consumption
The Default Periodic Consumption will be reduced to zero for all appropriate registers on a given MPRN.
- 6.4. CV19 manipulation of EUFs or AUFs does not trigger a 300 series market message.

7. QH sites

- 7.1. QH sites will continue to be polled by ESN.

- 7.2. Where consumption is recorded at the site it will be billed as normal to the supplier.
- 7.3. If for whatever reason the meter cannot be polled ESBN will follow the existing process [QH Validation Estimation and Substitution Summary](#) and where appropriate will set the consumption to zero.
- 7.4. On a weekly basis MRSO will send a list of successfully processed QH MPRNs to Eirgrid along with the effective date and cessation date when applicable.

8. Confirmation of Updates to the Supplier

- 8.1. Once ESBN has made the necessary updates MRSO will send a file to the supplier which will contain a status for each MPRN in the file.
- 8.2. The status will record whether the MPRN submitted by the supplier was successfully updated or not. If the MPRN was not updated successfully a reason will be provided that will be linked to the Supplier File Validation set out above.
- 8.3. The supplier should review the file and take whatever corrective action is required to resolve any unsuccessful updates.
- 8.4. If resubmitting an MPRN the "Date Added" field should be updated to reflect the new submission date.
- 8.5. Where an MPRN was not successfully updated by ESBN and the supplier will not be resubmitting the MPRN then the MPRN should be deleted from the file.
- 8.6. Where an MPRN was successfully updated by ESBN this MPRN should always remain in the file for each subsequent submission to ESBN up to the point the supplier requests cessation (see 5.2 CSSP Cessation for further information).
- 8.7. As set out above no more than one file per Supplier ID is permissible per day so any updates must be included in the next day file.
- 8.8. The CV19 manipulation of EUFs or AUFs does not trigger a 300 series market message to the supplier.

9. Crediting Standing Charge and Capacity (MIC) Charge to Suppliers for Eligible MPRNs

- 9.1. Where the MPRN passes the validation set out above ESBN will conduct the following post DUoS invoicing
 - 9.1.1. DUoS invoicing will occur as normal which will result in the normal DUoS Invoice being issued to the supplier
 - 9.1.2. Using the list of validated MPRNs ESBN will calculate the standing charge & capacity (MIC) charge applicable for the period
 - 9.1.3. In advance of the DUoS Invoice Payment Due Date ESBN will issue a credit note to the registered supplier for the sum of the standing charges and capacity (MIC) charges of all applicable MPRNs that have been waived.
 - 9.1.4. The supplier must pay ESBN the net amount i.e. the DUoS invoice amount less the credit note amount.
 - 9.1.5. Credit notes must not be carried forward.

10. Market Processes during the Supplier Suspension Period

- 10.1. ESBN has not put specific measures in place in the Central Market Systems to prevent existing market processes from executing for MPRNs availing of the CSSP.
- 10.2. The CRU decision [Covid-19 Supply Suspension due to Temporary Closure](#) states that Change of Supplier process will not be carried out at the site while the Covid-19 Supply Suspension is in place. There is no specific market process available to prevent a change of supplier from occurring. The onus is on suppliers to ensure that Change of Suppliers do not occur for MPRNs availing of the CSSP.

11. Returning to BAU post lifting of Supply Suspension Period by CRU

- 11.1. The Supply Suspension Period will run for [90 calendar days from the 1st May](#) unless terminated earlier by the CRU. After this date files from suppliers will no longer be accepted and ESBN will cease manipulating the EUF and Default Periodic consumptions to set them back to zero.
- 11.2. **DUoS and Data Aggregation/ Settlement Estimation**
 - 11.2.1. Following the ending of the Supply Suspension Period, the Default Periodic Consumption of zero will remain as the basis for meter reading estimation until such time that sufficient actual plausible readings are subsequently received, across an acceptable Representative Base period.
 - 11.2.2. The EUF will remain at zero until a settlement relevant plausible read is received.

11.2.3. Once a settlement relevant plausible read is received and processed a new Actual Usage Factor (AUF) is created applicable from the period between the last AUF +1 day to the date of the current settlement relevant read. A new EUF will be generated that is equal to the AUF that was just created. As additional plausible reads are received additional AUFs are created which in turn refine the EUF. The EUF is a weighted average of the previous AUFs up to 365 days previous. Please see [Estimation of NQH Meter Readings](#) for more information.

Note: Where a CV19 EUF was set as outlined previously, the subsequent EUFs that are automatically calculated will only consider AUFs that were created after the effective date of the CV19 EUF.

11.3. Standing Charge & Capacity (MIC) Charge

The standing charge and capacity (MIC) charge waiver will apply up to the date CRU set as the end date for the Supply Suspension Period.

11.4. Validation Window

Suppliers can submit files to ESBN for file validation on 29th and 30th April. This 2-day period is provided to allow suppliers to pre-validate MPRNs and correct any errors in advance of CSSP commencement date. Files received by ESBN on the 29th & 30th April will not be updated in the Central Market System and therefore if suppliers wish the MPRNs within these files to be included in the CSSP then they must submit these MPRNs in their file on or after the 1st May.

Files submitted during the Validation Window should follow the steps set out above in relation to submission of the files and file format i.e. no more than one file per day to be submitted by 12 midday.

12. Points to note

12.1. Submission Errors

The onus is on the supplier to ensure that they have obtained the customers consent to submit an MPRN through this process. If an MPRN is included in error and processed by ESBN the updates to the EUF and Default Period Consumption cannot be reversed or undone. To 'correct' the error plausible actual reads will have to be obtained and a Representative Base Period established as set out in [Estimation of NQH Meter Readings](#).

12.2. Readings received that indicate consumption during CSSP

12.2.1. Billing of consumption by ESBN

In addition to the important point called out in 6.1. please note that in the unlikely event, due to timing, processing of a plausible reading may temporarily result in a non-zero EUF being created. As set out above this will be reset to zero on a daily basis.

12.2.2. Customer ceasing to be eligible for CSSP

As set out above ESBN will bill any plausible actual read received during the period and will issue market messages as normal to the supplier. Where the supplier becomes aware that an MPRN should not have been included in the CSSP the supplier should email MRSO who will take appropriate action in relation to the CSSP.

12.3. Plausible Actual reads received post the CSSP

Where no readings have been received during the Supply Suspension Period the first plausible actual read will take account of any consumption used at the site since the last plausible actual read and the Covid19 restrictions being up in place. For example, if an NQH MD meter was reset on 29th February and the customer temporarily closed their site following the government restrictions imposed on Friday 27th March the next actual meter reading will include consumption between the 1st March and the 27th March as well as any other consumption recorded for the MPRN.

12.4. Historic Consumption and Future Estimation

Once the Default Period Consumption is reduced to zero, it will continue to be used for DUoS invoicing and issued to suppliers via market messages in the event that a plausible actual read is not available and up until such time of the receipt of two plausible actual meter readings across a Representative Base Period. Suppliers are advised that this will result in estimates that are not in line with the historic consumption at the MPRN. Suppliers should encourage customers to submit customer reads post ending of the Suspension Period or provide access to the meter reader. Ideally customer reads should be submitted in line with the ESB Meter Reading Calendar available here [Meter Reading Calendar 2020](#). Please see [Estimation of NQH Meter Readings](#) for more information on the Representative Base Period.

Where a CV19 EUF is set as outlined above the subsequent EUFs that are automatically generated by the system will not consider consumption history prior to the CV19 EUF update. Please note where a Change of Supplier occurs at an MPRN which has previously availed of the CSSP and before a new representative actual meter reading history is re-established the new supplier should be aware that estimates used for DUoS invoicing and Data Aggregation/Settlement will not reflect the full historic consumption as explained above.

12.5. Validity of CSSP Market Documents
 A Working Practice will be put in place to capture the CSSP. The Covid19 Supply Suspension Process Working Practice will be applicable for the duration of the CSSP.

Scope of Change

| Jurisdiction | Design Documentation | Business Process | DSO Backend System Change | MP Backend System Change | Tibco | Supplier EIMMA | Schema | Webforms | Extranet/NI Market Website |
|--------------|-------------------------------------|-------------------------------------|---------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|----------------------------|
| ROI | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| NI | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | <input type="checkbox"/> | <input type="checkbox"/> |

Co-Ordinated Baseline Market Design Documents Impacted by Request

Market Messages

| Message No. | Message Name | CoBL | ROI | NI |
|------------------|--------------|-----------|-----------|-----------|
| No Impact | No Impact | No Impact | No Impact | No Impact |

Data Definitions

No Impact

Data Codes

Market Message Implementation Guides

| ROI | Yes/No | NI | Yes/No |
|-----------|--------|-----------|--------|
| No Impact | Yes | No Impact | Yes |

Comments

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| ROI - Market Process Diagrams – MPDs | | |
|--------------------------------------|------------------------------------|----------|
| Market Process Diagram Number | Market Process Diagram Description | Affected |
| None | None | None |

| NI - Market Procedures | | |
|------------------------|-----------|--|
| Market Procedure | Affected | |
| No Impact | No Impact | |

| ROI Guidance Documentation | | |
|----------------------------|---------|-----------|
| Document | Version | Affected |
| No impact | | No Impact |

| RoI Briefing Document | | |
|-----------------------|----------|--|
| Briefing Document | Affected | |
| No Impact | Y | |

| User and Technical Documents | | | |
|------------------------------|------|---------|-----------|
| Reference | Name | Version | Affected |
| No impact | | | No Impact |

| Part 2 - Performance and Data Changes | |
|---|--|
| Market Messages volume, processing etc. | |
| Data | |
| Details of Data changes e.g. cleansing | |

| Part 3 - ReMCoSG / CER Approval | | |
|---------------------------------|---------|-----|
| Approved by | ReMCoSG | CER |
| | | |
| Comments | | |
| | | |