

Work Practice ID	Title	Type	Status
WP 0031	Interim Retail Market Microgeneration Solution		Final

Date Raised	9 May 2022	Implementation Date	29 th June 2022
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Change History		
Versi on	Date	Comment
V0.1	9 May 2022	Draft Working Practice issued to retail market participants
V1.0	29 June 2022	Final Working Practice issued to retail market participants
V2.0	21 Sept 2022	Update also made to amend deemed export formula to clarify that provision of deemed export values in the 344 xml file by ESB Networks to electricity suppliers is in kW not kWh Updated to reflect how ESB Networks will update an MEC to zero and communicate same to market participants
V3.0	22 Aug 2024	Updated to account for changes introduced by MCR1236, plus minor updates to improve clarity of understanding.

Identification of Retail Market Design Baseline Products Impacted
<ul style="list-style-type: none"> • Job Aid for SFTS • MPRN Enquiry Webservice Guide • MPRN Enquiry Webservice Metadata Guide • Retail Market Participant Extranet Website Guide • Downloadable Meter Point Files

Reason for Working Practice
<p>This Working Practice documents the retail market process for the 'Interim Retail Market Microgeneration Solution' as outlined in Market Change Request 1213 and subsequent updates to the IRMM Solution as outlined in MCR1236. MCR1213, approved by the Industry Governance Group on 2 February 2022, gives effect to the Commission for Regulation of Utilities' (CRU) decision on the 'Interim Clean Export Guarantee' (CRU/21/131) in the Irish retail electricity market. MCR1236 gives effect to the changes required to the IRMM Solution outlined in CRU Decision 202454 "Enduring Arrangements to Remunerate Customers for Microgeneration Exports".</p>

Applicability
<p>The scope of this Working Practice is limited to sites defined as either Microgeneration or Minigeneration connected sites as described in MCR1213. The parameters for these connection types are outlined as follows:</p> <p>Microgeneration</p>

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Renewable self-consumers who have an MEC <6kW (single-phase) and <11kW (three-phase) are classified as microgeneration sites.

Minigeneration

Renewable self-consumers who have an MEC 6kW-17kW (single-phase) and 11kW-50kW (three-phase) as classified as mini-generation sites.

Sites above 50kW

Sites above 50kW will adhere to Enduring Connection Policy processes. For sites above 50kW with export capability, a QH meter will be installed and follow the existing WP0014 process.

Eligibility for 'Interim Clean Export Guarantee'

Eligibility for remuneration of the 'Interim Clean Export Guarantee' is detailed by CRU in CRU/21/131.

Timelines

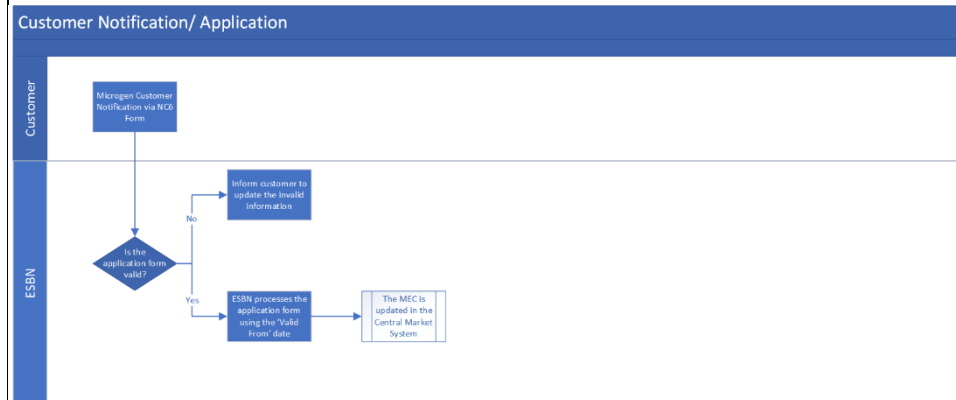
As per CRU/21/131, ESB Networks is required to make available both smart meter export data and deemed export data to the registered supplier by end of Q2 2022.

It is expected, as stated in MCR1213, that the Interim Retail Market Microgeneration Solution as detailed in this Working Practice will be subsumed by the enduring microgeneration solution – currently expected to be delivered at the end of Phase Three of the NSMP.

Working Practice

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Step One – Customer Notification / Application



Microgeneration

1. A renewable self-consumer who wishes to install microgeneration technology must notify ESB Networks (ESBN) that they intend to do so as per the CRU Decision Paper (CRU/07/208) via NC6 Form which can be found at this [link](#)
2. The MEC will only be updated in the Central Market System once the relevant notification / application form is processed by ESBN.
3. The 'Valid From' date of the MEC will be the date the NC6 Form is processed by ESBN.

Notes:

4. A customer who has previously submitted the relevant notification / application form and has an existing Maximum Export Capacity (MEC), is not required to re-submit the relevant notification / application form to ESBN.
5. If a customer is unsure if the relevant notification / application form has been submitted previously to ESBN, the customer can check with their supplier whether there is an MEC value at the site.
6. If the supplier confirms that there is no MEC associated with the customer's MPRN, then the customer should complete the relevant notification / application form and submit to ESBN. ESBN will not retrospectively update the MEC in the Central Market System.
7. If a customer requires a permanent change to their MEC then the customer should contact ESBN who will arrange for the MEC value to be updated on the Central Market System subject to the appropriate conditions being met.
8. CRU/21/131 highlights that ESBN does not record technology type. Therefore, ESBN does not require generation technology type to be updated and processed in the Central Market System and is outside the scope of requirements for the interim retail market microgeneration solution
9. ESBN cannot be held accountable for any discrepancy between the MEC value provided to ESBN versus the actual generation capacity at the premises. As per CRU's decision paper (CRU/21/131), ESBN is required however to review our process after 12 months of operation of CEG and to take any further steps necessary to mitigate the risk of fraudulent or manipulative activity. This may include an audit, including the post-installation inspection of a representative sample of new NC6 installations. The details of this review will be developed over the course of the first 12 months of the CEG.

Minigeneration

10. A renewable self-consumer who wishes to install minigeneration must apply to ESBN
11. For more information on the process for connecting minigeneration sites, please consult the ESBN website at this [link](#)

Step Two – Fieldworks

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12. As stated in CRU's decision paper (CRU/21/131), customers with 24-hour tariffs (MCC01) meters are currently eligible for a smart meter installation as part of the ESB Networks led deployment approach at the time of publication (1 December 2021). Please note, there are additional technical and other criteria which ESB Networks considers before a smart meter can be installed. These criteria may change as the SMART project evolves and new smart meters are introduced.
13. When the MEC is updated for an MPRN in the Central Market System, this will be the trigger for ESBN to make an assessment as to whether a site is eligible to have a smart meter installed
14. If a site is eligible to have a smart meter installed as part of the ESBN-led deployment approach, then CRU/21/131 requires ESBN to install a smart meter at that site within four months of the MEC being updated on the Central Market System.
15. In line with the requirements set out in CRU Decision 202454 and MCR1236, where ESB Networks are unable to install a smart meter within the four-month period (120 calendar days), the customer may be eligible to have deemed export quantities sent to their registered. ESB Networks will use the following criteria to determine eligibility for same:
 1. Where no "Smart Non Participation Codes" are flagged in Central Market Systems: deemed export quantities to issue to registered Supplier in relation to this customer until such time as a smart meter is installed;
 2. Customer is "Smart Non Participation Code 02 - Non-Technical Non Participation": no deemed export quantities will issue;
 3. Customer is "Smart Non Participation Code 03- Multiple Visit No Access": no deemed export quantities will issue;
 4. Customer is "Smart Non Participation Code 04 - Smart meter Exchanged Deferred": this will be assessed by ESB Networks on a case-by-case basis. Where ESB Networks are responsible for the delay in exchanging the meter, deemed export quantities will issue to the customer's registered Supplier. The provision of the deemed data should act as the indicator that the customer is eligible for deemed export quantities, in this case.
16. If a customer who is eligible for a smart meter as part of the ESB Networks-led deployment refuses a smart meter, ESBN will not provide deemed export quantities to the registered supplier.
17. ESBN will adhere to the requirement to install a smart meter within four months, but allowances need to be made for practical challenges including (but not limited to):
 - a. Safety or other technical issues affecting smart meter installation on the day
 - b. Revenue protection issues
 - c. No access issues on the day
 - d. Network issues which may result in a delay to the smart meter installation e.g. storms
18. If a site is not eligible to have a smart meter installed as part of the ESBN-led deployment approach, then this site will be eligible for remuneration via CRU's deemed export formula

Notes:

19. ESBN will provide deemed export quantities to the registered supplier for MCC02 sites by default. However, MCC02 sites will also be eligible for a smart meter via 'Customer-Led' approach to be developed as per [MCR1215](#) requirements. Please note, there are additional technical and other criteria which ESB Networks considers before a smart meter can be installed.
20. ESBN will continue to provide deemed export quantities to the registered supplier if a site that was ineligible for smart meter exchange becomes eligible for a smart meter. If NTNP, MVNA or SED (where ESBN not responsible for delay in exchange) (Smart Non Participation Code 02/03/04) then deemed export quantities cease to be provided.
21. If ESB Networks provides deemed export quantities while ineligible for a smart meter, ESBN will continue to provide deemed export quantities until a smart meter is installed or customer flagged as NTNP.

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22. MPRNs with a new MEC only receive deemed export quantities **immediately** if they are ineligible for a smart meter at the time of MEC update i.e. if previously deemed export quantities flowed then they will continue to do so until a smart meter is installed or NTNP. ~~Otherwise deemed factor export quantities will not flow the same as proposed for MCC04.~~ **Otherwise, where eligible, deemed export quantities will be provided from the expiry of the four-month period unless the customer meets any of the criteria set out in point 15. above.**

Step Three – Systems Updated and Supplier Notification



- 23. ESNB will update the Central Market System with the MEC details contained in the relevant notification / application form for that MPRN
- 24. The MEC value will be updated in the Central Market System to reflect the true value of the MEC as per the relevant notification / application form
- 25. When the MEC is updated on the Central Market System, this will trigger the 301MM¹ to the registered supplier with the MEC. Note, the MEC is provided as an integer in the Market Message Schema
- 26. The MEC will also be updated in the Access Systems for that MPRN. The Access Systems are as follows:
 - a. Extranet
 - b. Webservice
 - c. SFTS – domS_CUST downloadable file
 - d. SFTS – COMM_CUST downloadable file

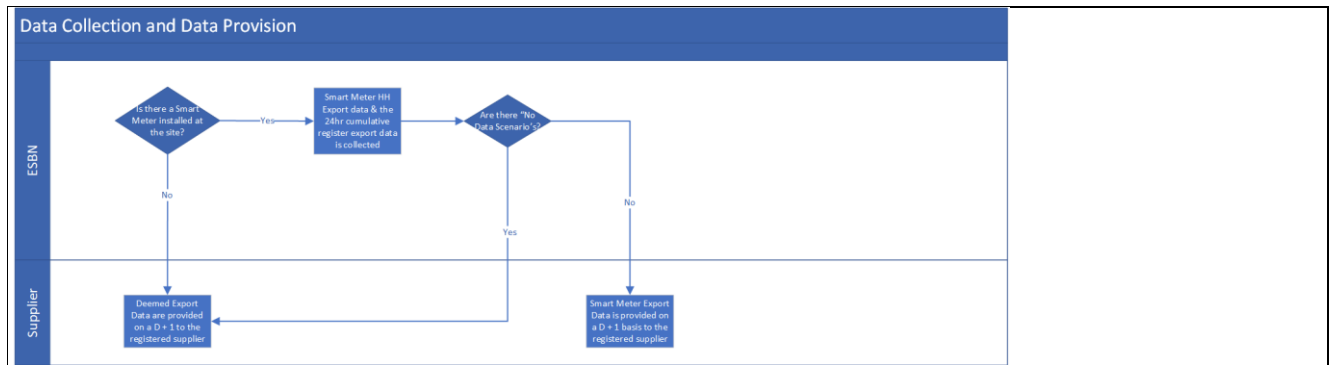
Notes:

- 27. The MEC value will be displayed as a decimal to seven decimal places i.e. (16,7) e.g. 123456789.1234567 on the Access Systems. Leading zeroes will be omitted for aesthetics
- 28. When a smart meter is installed at a customer’s premise, the registered supplier is notified via existing methods
- 29. Where a customer with a valid MEC contacts ESB Networks informing us that the customer’s microgeneration technology has since been removed, not connected or stopped working on a permanent basis, ESB Networks will:
 - a. Update the MEC value to 0.0000001 in the Central Market Systems
 - b. Please note, a 301MM will still be triggered to the registered supplier in these instances with an MEC value of zero
 - c. The Access Systems (Extranet, Webservice and DOMS_CUST and COMM_CUST) will display 0.0000001 as the MEC value
 - d. However, given the MEC will in effect be zero for these MPRNs, ESB Networks will not be providing smart meter export data nor deemed export quantities to the registered supplier via the SFTS

Step Four – Data Collection and Data Provision

¹ Please note, the MEC is also provided on the 101MM, 102MM, 105MM, 330MM, 101PMM, 102PMM, and 301NMM.

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Smart meter export data

30. Where a smart meter is installed at a site with an MEC, ESBN will attempt to collect both the smart meter HH export data and the 24hr cumulative register export data regardless of Meter Configuration Code of the MPRN in the Central Market System

31. As per CRU/21/131, ESBN is required to provide this smart meter export data to the registered supplier

32. Therefore, where smart meter export data is available, ESBN will provide smart meter export data on a D+1 basis (for communicating meters) to the registered supplier for the MPRN / read date in the following format:

Cumulative 24hr register read:

- a. Via xml file format based where possible on 345MM structure. The new xml file format is referred to, in this document, as the 345 xml file. This is not necessarily the exact same as the 345 xml Market Message
- b. Files will be made available via the Secure File Transfer Service (SFTS) for the supplier to download

HH export intervals

33. Via xml file format based where possible on 343MM structure. The new xml file format is referred to, in this document, as the 344 xml file. This is not necessarily the exact same as the to be defined 344 xml Market Message which is expected to be delivered as part of Schema Release V15.00.00

34. Files will be made available via the SFTS for the supplier to download

Once export data is made available to the registered supplier, it will be retained in the SFTS for a minimum of 30 days.

Smart meter export data – NO DATA scenarios

35. Please note, there is no mechanism in the interim retail market microgeneration solution for ESBN to accept customer export readings

36. ESBN will provide deemed interval values when the customer has a smart meter, but no smart meter export data is available. The deemed intervals will have an interval status of 'DEEM' in the 344 xml file

37. The 345 xml file will only be provided for MPRNs and Read Dates where ESBN have the complete day's actual interval values. The 345 xml file will not consider deemed interval values

38. The 344 xml file may contain data for an MPRN / Read Date combination with interval statuses of deemed and another MPRN / Read Date combination that will have interval statuses of actual. i.e. there will not be separate 344 xml files for deemed and actual

39. Deemed values may be provided regardless of CTF value. A higher CTF value reduces (but does not remove) the probability of deemed values being provided

40. Deemed export values will never be replaced with actual values

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NO DATA Scenarios

Number	Scenario	Retail Market Impact
1.	All Data arrives and passes all validations	Supplier receives files populated with smart meter export data
2.	No smart meter export data for 7 days	Days 1 to 7: Neither 344 xml file nor 345 xml file Day 8: 344 xml file for Day 1 containing deemed export Day 9: <ul style="list-style-type: none"> • 344 xml file for: <ul style="list-style-type: none"> ○ Day 2 containing deemed export for all intervals ○ Day 8 containing Interval Export Data 345 xml file for Day 8 containing Cumulative Export Data
3.	Partial data available / Data validation failure	<ul style="list-style-type: none"> • 344 xml file for previous day containing deemed export data • No 345 xml file data provided
4.	De-energisation	<ul style="list-style-type: none"> • 344 xml file for previous day containing Interval Export Data • 345 xml file for previous day containing Cumulative Export Data • 344 xml file for day of de-energisation containing deemed export data • Day after de-energisation, no files sent to suppliers
5.	Re-energisation	344 xml file for day of re-energisation containing deemed export data Two days after re-energisation: <ul style="list-style-type: none"> • 344 xml file for 'Day after re-energisation' containing Interval Export Data • 345 xml file for 'Day after re-energisation' containing Cumulative Export Data
6.	Smart meter removed or replaced with legacy meter	No files sent to suppliers as there is no actual data available. Deemed data is not provided for MPRNs that are eligible for a smart meter where a smart meter is not installed
7.	Smart meter replaced with a smart meter	344 xml file for exchange date containing deemed export data • No 345 xml file data provided

Deemed export data

41. CRU/21/131 requires ESNB to calculate deemed export quantities utilising CRU's deemed export formula and provide to the registered supplier for those sites which are not eligible for a smart meter as part of the ESNB-led deployment approach

42. When ESNB, calculates the deemed export quantity per 30 minute interval, it will use the following formula:

$$\text{Deemed Export Quantity} = \text{MEC} \times \text{Capacity Factor} \times \text{Export Factor}$$

The above formula is derived from the CRU's published formula. This allows ESB Networks to

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provide the deemed export quantities in kW not kWh per 30-minute interval.

- a. For simplicity a Power Factor of unity is used as this will avoid customer confusion and, given the need for approximation in other figures within the formula, will not make a material difference to the results
43. Deemed export quantities will be provided on a calendar day basis at D+1 to the registered supplier for the MPRN / read date in the following format:
- a. Deemed export intervals
 - i. Via 344 xml file format similar to the actual interval values
 - ii. The deemed intervals will have an interval status of 'DEEM.'
44. Files will be made available via the SFTS for the supplier to download

Notes:

- 45. CRU/21/131 also requires flat profiling of deemed energy quantities (i.e., an annual assumption for the deemed energy which is evenly divided across all settlement intervals)
- 46. It is anticipated that the need for the calculation of deemed quantities approach will cease on completion of Phase Three of the National Smart Meter Programme

Where smart meter export or deemed export data needs to be re-sent

In the event of a backdated Change of Supplier or Change of Supplier Cancellation, the smart meter export or deemed export data will be re-issued to the registered supplier currently registered for the read dates that were previously sent to a different supplier. This correction of recipient will be executed in line with the proposed daily processing.

Smart meter export data (Transitional Arrangement)

- 47. CRU/21/131 states that renewable self-consumers are eligible for remuneration commencing from 'Day 1' (confirmed as 15 February 2022 in [Statutory Instrument 76 of 2022](#))
- 48. ESBN will make available the smart meter export data (in 24hr register and HH interval format), where available, to suppliers retrospectively back to 'Day 1'
- 49. CRU/21/131 requires ESBN to make smart meter export data available to suppliers retrospectively back to 'Day 1' by the end of June 2022
- 50. ESBN will make available the deemed export data to suppliers retrospectively back to 'Day 1'
- 51. CRU/21/131 requires ESBN to make available deemed export data to suppliers retrospectively back to 'Day 1' by the end of June 2022

Treatment of Non-Technical, Non-Participants (NTNPs)

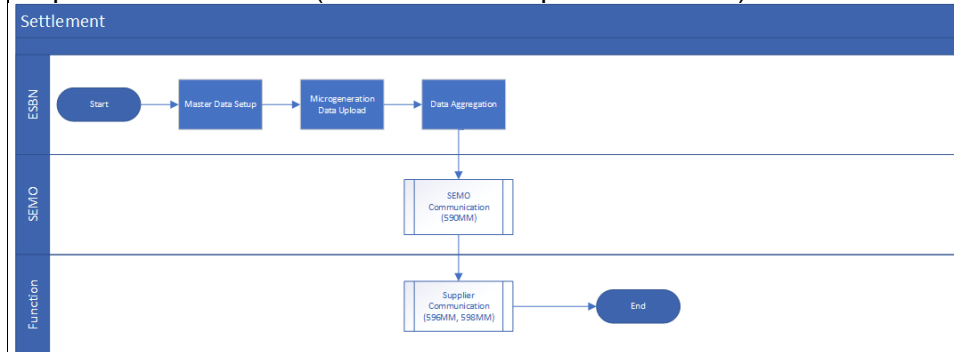
Customers that refuse or previously refused a smart meter (NTNP) will be ineligible for remuneration. Customers that previously refused a smart meter should contact their supplier or ESBN in order to request a smart meter and to understand what applies. ESBN will specify the steps a customer must take if it wishes to re-apply for a smart meter, as well as the arrangements that will apply in that situation.

Please note, in instances where a retrospective NTNP status must be applied to a site, but ESB Networks has already provided smart meter export data to the registered supplier, the NTNP status will take precedence in data aggregation.

After installation of a smart meter, ESBN will provide either deemed export quantities or actual smart meter export data to the registered supplier from the date of meter installation. The current processes for updating an NTNP status will be utilised in this regard and no changes are proposed arising from this MDR.

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Step Five – Settlement (Interim Clean Export Guarantee)



Interim Clean Export Guarantee

In line with MCR1236, ESNB will aggregate and upload all microgeneration export data for each supplier in advance of M+4 settlement. M+13 settlement, 65 days in arrears, on the following dates (dates used are subject to further refinement and are provided here for illustrative purposes):

- February 2023 (back to February 2022 to October 2022 approximately)
- November 2023 (back to November 2022 to August 2023 approximately)
- September 2024 (back to September 2023 to May 2024 approximately)
- June 2025 (June 2024 to February 2025 approximately)
- September 2025 (March 2025 to August 2025 before the enduring solution is implemented)

52. The aggregation of microgeneration data at MPRN level will be executed outside of the Central Market System

53. Each supplier will be required to nominate a supplier unit to MRSO in advance of November 2022 for all of their microgeneration export for the entirety of the interim retail market microgeneration solution. The microgeneration data aggregated outside of the Central Market System will be a summation of all the microgeneration data for the nominated supplier unit per 15 minutes and in kilowatts. Details of this can be found below:

54. For each settlement period for which Microgeneration data must be pre-aggregated: -

55. For each Supplier which has at least one Microgeneration site registered within the settlement period

- a. For each Settlement Date within the settlement period
 - i. Summate the kW Export values (Metered or Deemed) for the 1st Half-Hourly Interval for all Microgen sites registered for Supplier for Settlement Date
 - ii. Save the sum calculated by Step 1 into the relevant Quarter-Hourly Interval values of the profile representing the Totalised kW Export for Supplier for Settlement Date
 - iii. Repeat steps 1 and 2 for each Half-Hourly Interval for Settlement Date

56. The above data will be manually made available by MRSO to Data Aggregation processes that run for the settlement dates where the data has been uploaded. The Data Aggregation processes will convert the KW to kWh

57. The aggregated microgeneration data will be flagged as estimated

58. Microgeneration data can be loss adjusted at the aggregate level. Site specific loss factors cannot be applied at a microgeneration MPRN level. ESNB will apply the LV DLAF profile for microgeneration data subject to confirmation

59. Loss-adjusted microgeneration data will be netted from the total import per supplier unit and the netted value will be sent to SEMO via the 590MM

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- 60. Suppliers will receive a copy of the 590MM via the 596MM as they currently do
- 61. Suppliers will receive a copy of the microgeneration aggregated quantities via the 598MM
 - a. MRSO will inform suppliers of the Export Arrangement Reference Number that identifies the aggregated microgeneration total in advance of the first time they receive the 598MM
- 62. Please note ESNB will aggregate and upload all microgeneration export data as part of this settlement process regardless of any other eligibility criteria that is yet to be defined

Notes

- 63. No values will be aggregated for periods where an MPRN has a status of de-energised

It is expected that this Working Practice (i.e. the Interim Retail Market Microgeneration Solution) will be superseded by the enduring solution currently anticipated to be delivered at the end of Phase Three of the NSMP.

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Supplementary Information

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