Discussion Request 1215		MCC02 Smart Meter Exchanges	
Status	Issued to Market	**Priority**	Medium	**Status Date**	23/02/2022

Date	Version	Reason for Change	Version Status
22/09/2021	1.0	Progress Solution on MCC02 Smart Meter Exchanges	Final
17/12/2021	1.1	Updated with CRU decision	Final
23/02/2021	1.2	Updated by RMDS following feedback	Final

Part 1 DETAIL OF DISCUSSION REQUEST / MARKET CHANGE REQUEST
Requesting Organisation(s)	RMDS
Request Originator Name	Lindsay Sharpe
Date Raised	03/09/2021

Classification of Request	
Change Type	Schema Impacting

Detail of Request
Reason for Request

Background

The National Smart Metering Programme (NSMP) aims to replace Ireland's existing meters with smart meters (SM) by the end of 2025. It currently operates in accordance with the ESBN-Supplier 2017 agreement that addressed the replacement of 24-hour meters.

1) 2 basic principles were agreed (& have applied ever since), that:
   a. A customer led approach be adopted
   b. A like for like meter swap be employed where that does not pertain.
2) In 2020 an agreement to specifically address MCC02s came into place (when the MCC02 WG agreed a ToR and subsequently, that it be done via Option.4 *"Suppliers request the MCC02 exchange and manage the customer"*).

Phase 1 delivered on the above, with MCC01 (single phase) legacy meters being exchanged for smart meters with the same MCC01 meter configuration. The like for like exchange in terms of MCC allowed for unilateral, ESBN driven deployment & management. The deployment has been successful, in part, due to it not requiring a change in customer journey or any differing interventions by individual Suppliers in their customer tariffing or with their customers who have had a meter replacement. Once Phase 1 of the Smart Programme went live in March 2021, customers with a SM were able to opt for a smart tariff by engaging with their supplier who managed the tariff change/product change process and customer journey. This to date has proven to be successful, supported by the regulated primer comms to consumers to encourage smart services and more specifically, Time of Use tariff uptake.

Day/Night Meters configured as MCC02 are the second largest cohort of domestic meters in RoI and are supported by Supplier specific Day/Night Tariffs (311,616 MCC02 in DG1,2,5, as of 03.07.21). Additionally, ESBN has indicated that there are some customers with Microgen capacity with a MCC02 meter.

~~Current ESBN proposal~~ESBN led deployment

From January 2022, ESBN propose to move to a network led approach for the exchange of MCC02 (day/night) meters. ESBN propose to exchange a day/night MCC02 meter with a smart meter, set at MCC16 (Day, Night and Peak) on commissioning.

The network led ESBN deployment approach has been conditionally supported by the CRU (CRU/21/074) which indicates the following "*CRU considers that a Networks Led deployment to MCC02 (day/night) Customers should commence from January 2022 to allow sufficient time for suppliers to update the customer journey*".

Customer and supplier concerns:

The retail market has to date, used MCC's to determine the tariff category/structures that are offered to consumers. Suppliers have historically offered 24hr rates to MCC01 customers and day/night tariffs (different day/night unit rates) to those on MCC02 configurations. This logic continues by aggregation of settlement volumes in accordance with the load profile for that class for those customers (LP2) and the DUoS structures that map to the MCC's.

Notwithstanding the expected circulation of the relevant DR detail from ESBN, this DR is based on the following:

- ESBN exchange MCC02 meter with MCC16 smart meter.
- Customer is moved from Day, Night data recording/read recording to a Day, Night, Peak read recording.
- Suppliers will be advised of a meter exchange and a MCC change along with new readings on suite of MM.

The challenge is, as a standalone body of work, this would result in a tariff change for the customer, thus changing the nature of the bi-lateral contract between customer and supplier.

The current smart tariff change process (as well as all legacy change between 24hr and D/N meters and vice versa) is driven by the customer through the supplier. See MPD 11 and V13 amended MPD24, MPD25, MPD01, MPD02, MPD10. The reason for this is the intrinsic relationship between the MCC and the tariff structure, contract and agreement that the supplier has with their customer. The customer requests a change in tariff, the supplier agrees new terms with the customer and then requests a MCC change to allow those terms to come into effect. Once the meter is changed, the new MCC and the associated read structures are sent to the supplier to be able to calculate their tariff based on the customer and supplier contract.
While the customer journey has not yet been defined, it has been suggested, by ESBN:
- That every Day/Night customer would be informed of the change happening via one or more of the existing customer engagement triggers that ESBN issue, (yet to be detailed).
- In parallel the supplier would be sent a list of their customers that have been issued the trigger.
- The expectation is that suppliers would proactively contact the customer and begin a re-contracting journey prior to the exchange taking place.

This proposal has contractual implications that interferes with the existing bi-lateral contract between the supplier and customer, it:

- Would place significant burden on suppliers to engage with all impacted customers to advise of contract term and tariff changes and seek agreement.
- May also prompt a customer to opt out of the programme through non-technical non-participation.
- Poses a risk that a customer may not receive or may not engage with the tariff or contract change communication and will have their meter exchanged without their perceived knowledge or consent.

The proposed meter exchange does not cater for a removal from the meter exchange programme, where a customer does not wish to recontract or does not engage with the process. This is a deficit that exists in the proposal and were it not to be catered for it would interfere with the existing contract between supplier and customer. In addition, we also have concerns that the networks led replacement of MCC02 to MCC16 does not align with current policy / established practice, which offers the customer the choice to activate smart services.

Summary:

The details above are intended to reflect the level of work and impacts on customer, supplier and the integrity of the NSMP that would result from ~~the current ESBN proposal~~ <mark>Networks led approach</mark>.

Proposed Solution

CRU recognise that there is a risk that the customer experience could be negatively impacted in a Networks Led approach for MCC02 meter exchanges. However, to allow ESBN to continue deployment, the CRU has approved DR1215 for an enhanced customer-led approach with the following amendments:

- CRU is not mandating for a new MCC to be introduced
- ESBN and suppliers are asked to work together to enhance the customer led approach which facilitates, encourages and provides for mass participation by customers
- ESBN are to work with suppliers who are ready to support smart exchanges for MCC02 customers including in groups/cohorts as agreed between ESBN and suppliers
- In the context of the updated Smart Load Profiles below, the CRU clarifies that the SST price differential cited in previous decision(s) does not need to be in place for day/night customers upon meter exchange.

The Smart Standard Load Profiles for 2022 (LP25, LP27 and LP29) which were recently released by ESBN have been generated using the same standard profile data collected and processed for Day / Night (MCC02) Customers, and used to generate LP2, LP4 and LP6. This negates the potential impact on cost base that would have existed based on the 2021 SST Standard Profiles.

If suppliers wish to offer customers a like for like exchange, the absence of a price differential will enable them to offer an existing D/N customer the same tariff rate that they are currently receiving thus not changing the existing contract between customer and supplier and ensuring the customer has a like for like meter exchange experience. Alternatively, a supplier can engage with the customer directly to transition them to a new TOU tariff supported by a smart meter.

<mark>The CRU requests an enhanced customer led approach with ESBN and suppliers working together to facilitate MCC02 customers who wish to have a smart meter installed. The CRU is not requesting a supplier campaign, rather, it is expected that suppliers who are ready to facilitate MCC02 customers to a smart meter exchange, will inform/communicate with their customers in this context.</mark>

<mark>The CRU is not providing a timeline or definition for the enhanced customer led approach. A customer led approach already exists and the CRU is requesting that suppliers and ESBN work together to enhance that approach. The existing appraoch does not require, albeit would likely be enhanced by, the participation of all suppliers and ESBN.</mark>

CRU asks ESB Networks and suppliers to work together to develop and improve the customer journey which is summarised below:

1. Suppliers identify MCC02 customers who are in a position to receive a smart meter configured to MCC16 (either for a like for like tariff exchange or for a tariff change agreed with the customer) and send through a list of MPRNs to ESB Networks. This signal for exchange is provided to ESBN only when the customer is ready and supported by their supplier.

2. MPRNs will be sent through to ESBN using the agreed spreadsheet process and emailed to meterop.esbnetworks@esb.ie.

3. MPRNs will be added to the existing ESB Networks deployment plans. ESB Networks will confirm to suppliers an estimated date for exchange.

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4. ESB Networks will issue the first and second letters to customers in advance of the exchange taking place (contents of letter to be reviewed by suppliers and ESB Networks and adapted if necessary). ESB Networks will only issue letters to customers who have been identified to them by suppliers and after ESB Networks have informed the supplier of the estimated date for exchange (based on the relevant deployment planning window).

5. Once the exchange is complete the 30 day Comms Proving period will commence to determine the initial CTF value at the MPRN. As per v13.00.00 design, this will determine how the meter will be managed by ESBN (i.e. whether remote or manual operation) and the level of Smart Data Services that can be offered to the customer. The existing v13.00.00 processes will apply for any requests for any Smart Data Services requests.

If a customer contacts ESB Networks directly requesting a Smart Meter they will be redirected to their supplier. to be included in their plans to ensure that the supplier is aware of which MCC02 customers are receiving Smart Meters.

MCC02 – MCC16 exchanges outside of the enhanced customer led process.

ESB Networks has confirmed that in addition to the enhanced customer led approach outlined in this document, a meter exchange to MCC16 can also take place where an increased or decreased connection (i.e. a change in Maximum Import Capacity) is requested by a customer.

This includes:
a) Where a site is currently MCC01 and the customer indicates on the increased / decreased connection form that they intend to request a Time Of Use tariff from their supplier, or;
b) Where a site is currently MCC02 and therefore is already availing of a TOU tariff. In both instances, MCC16 is the default TOU MCC for customers <=16kVA, in line with the new connections process introduced as part of v13.00.00. The 301N will issue to the registered Supplier notifying of proposed changes to Meter Point Characteristics.

A fault exchange will not result in a change from MCC02 to MCC16.

Microgen customers can continue to request a Smart Meter. Individual Suppliers are to determine if they wish to facilitate Meter exchange requests from Microgen customers

CRU may review the exemption of a price differential at a later date as customers switch to smart tariffs.

This proposed approach would allow the principle of a customer led transition to Smart Services to remain and for continuation of the customer journey, i.e. for all legacy MCC's, to be the same as that of the MCC01 journey, which has proven successful to date.

A new Working Practice will be developed and approved by industry for the customer led approach of replacing MCC02 meters with Smart Meters. This will be developed through a dedicated MCC02 Working Group.

The MCC02 – MCC16 Meter Exchange Working Practice is to consider, but will not be limited to the following:

Processes and Timelines to Support Meter Exchanges
Customer Correspondence Content and Roadmap
ESB Networks Support Arrangements for Suppliers
Customer Consent and Opt Out Management

CRU hopes that this approach will allow for the continuation of the contribution of the NSMP to meet national decarbonisation targets

Scope of Change

Design Documentation	Business Process	DSO Backend System Change	MP Backend System Change	Tibco	Supplier EMMA	Schema	Webforms	Webservice	Extranet Market Website
☐	☐	☐	☐	☐	☐	☐	☐	☐	☐

Market Messages

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

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Data Definitions

No Impact

Data Codes

Market Message Implementation Guides

ROI	Yes/No	NI	

ROI - Market Process Diagrams – MPDs

Market Process Number	Market Procedure	Affected	
No Impact		Yes	

Guidance Documentation

Document	Version	Affected
No impact		No Impact

Briefing Document			
Briefing Document		**Affected**	
No Impact		Yes	

User and Technical Documents			
Reference	**Name**	**Version**	**Affected**
No impact			No Impact

Comments

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

Approved by	**CRU**