NETWORKS

Smart Meter Upgrade Access to Near Real Time Metering Data

ESB Networks' response to CRU consultation CRU202579

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Contents

1. Introduction

ESB Networks welcomes the opportunity to respond to the Commission for Regulation of Utilities' (CRU) consultation on 'Access to Near Real Time Metering Data'.

ESB Networks is committed to supporting the CRU in the development of the smart metering programme and will continue to work closely and collaboratively with the CRU and other stakeholders on its ongoing development.

1.1 Role of ESB Networks

ESB Networks DAC (referred to in this submission as 'ESB Networks') functions as Distribution System Operator (DSO), and manager of ESB's Distribution Asset Owner (DAO) and Transmission Asset Owner (TAO) functions. ESB Networks works to meet the needs of all Irish electricity customers – generation and demand - providing universal access to the electricity system. We deliver and manage the performance of a system of almost 157,000 km of overhead networks, 27,000 km of underground cables and 800 high voltage substations. To date we have connected almost 6.5GW of renewable generation to the distribution and transmission systems, from microgeneration, mini-generation and small-scale generation through to large amounts of distribution and transmission connected renewable generation. We have almost 2.5 million demand customers, of which currently more than 130,000 are now becoming active customers – including, but not limited to, domestic and commercial premises with microgeneration/mini-generation (a rapidly increasing number); participants in flexible demand; and premises with battery storage.

Retail Market Services
ESB Networks delivers a range of services to the Irish retail electricity market servicing almost 2.5 million customers. It manages relationships with market participants and provides data in a timely and accurate fashion on a daily basis. It supports the wider Irish market through the ring-fenced Meter Registration System Operator (MRSO) and Retail Market Design Service (RMDS) and supports the wholesale Single Electricity Market through the provision of aggregated meter data.

National Smart Metering Programme
ESB Networks is a key stakeholder in the delivery of the CRU's National Smart Metering Programme (NSMP) which is a key enabler for active customers. To date, ESB Networks has installed over 2 million smart meters in homes and small businesses throughout Ireland. Of these, over 150,000 have been installed at sites with export capacity. This represents an important achievement for the NSMP and has enabled these customers to be remunerated by their supplier, based on export measured through their smart meter.

ESB Networks' On-Line Account

Since November 2022, we have been providing customers who have a smart meter with access to their consumption and export metering data. To date there have been over 1,000,000 visits to the "My Energy Consumption" pages, almost 400,000 Harmonised File downloads and over 130,000 linked[1] accounts established.

The On-Line Account, and the services that it provides, are being utilised by an increasing number of customers every week and by price comparison websites (PCWs) including Bonkers.ie, Energypal.ie, Kilowatt.ie and the DCU Energy Calculator tool. The benefits of the On-line Account and its integration with PCWs is set to continue with the implementation of the Smart Meter Data Access Code (SMDAC).

Smart Meter Data Access Code Implementation

The integration of smart meter data with the services of market participants is being facilitated through ESB Networks' implementation of the SMDAC. The implementation is expected to take another 12 months with an on-going process of enhancement and development expected to follow.

The implementation supports the CRU's objectives to promote competition and customer choice, especially in light of Suppliers offering customers new types of tariffs. These include 'time of use' tariffs that have different prices at different times of the day or on different days of the week. Customers need PCWs that give clear and reliable information on these new tariffs. Integration with a customer's On-Line Account allows PCWs to show comparisons based on actual usage instead of the Estimated Annual Bill (EAB), which is based on averages. This type of information is likely to drive switching and promote competition.

1 *Linked accounts are those where the customer has linked their MPRN.*

2. ESB Networks Response to Consultation Questions

In Home Displays (IHDs) have been a feature of a number of smart meter rollout programmes across the world.

IHDs provide customers with a snapshot of energy consumption which is normally presented as a cost (£ / € / $) rather than a consumption figure (kWh). Typically, it is the Supplier who is responsible for procuring and providing the IHD which includes automatic updates to tariffs.

An IHD has to connect to a smart meter and is therefore normally located in the room closest to the meter itself. This means that it is not easy to walk around the house and see the instantaneous effect of switching appliances on and off.

IHDs are produced by 3rd parties rather than utilities themselves which means updates and upgrades are controlled by the 3rd party and the products themselves are not market or consumer specific, they therefore lack personalisation which can affect how long they are perceived to be useful.

In Great Britain, there is a significant body of evidence showing that IHDs are the most common source of customer complaints and frustration in the smart meter programme[1].

It is in the context of these practical limitations and experience elsewhere that ESB Networks is responding to this consultation.

2.1 Response to Question 1

Do you agree with the CRU's proposal to remove the requirement on ESB Networks to provide a physical IHD device to all customers who request one, through their supplier?

ESB Networks agrees with the CRU proposal to remove the requirement for it to provide a physical IHD device to all customers who request one through their Supplier as it is not considered to be economic or efficient.

Our view is that an ESB Networks provided IHD would have several disadvantages including the absence of automatic tariff updates which would be an obstacle to adoption and usefulness of the information presented to customers.

Further, since 2012, technology has rapidly advanced, and customer expectations have continued to evolve as people have become increasingly familiar with the smart devices being connected in their homes. In 2018, 78% of adults in the UK used mobile phones or smartphones to access the internet[2] have come to expect real-time access to their data from a range of service providers ranging from online banking, to travel cards, to online streaming services.

While some consumers clearly respond to the direct feedback provided by IHDs, there is evidence that many lose enthusiasm or interest over time once initial savings have been locked in.

1 *Energy Consumer Satisfaction Survey - Interim Report of Findings January 2025*

2 *Office for National Statistics (2018). Internet access in Great Britain, including how many people have internet, how they access it and what they use it for. Available here*

Research has shown that while some users engage with their in-home displays initially, many do end up relegating them to a drawer after a few months[1]. This is often due to a drop-off in interest, lack of perceived value, or the novelty wearing off.

In 2016, the UK Government announced a derogation process in which the IHD mandate would be relaxed, and Suppliers would be enabled to trial alternatives to IHDs.

Suppliers in the UK are transitioning from IHDs to app-based services accessed via smart phones and tablets. For example, Octopus Energy are introducing their Octopus Home Mini[2] which provides a basis for ongoing innovation and personalisation of information which is more likely to drive continuous customer engagement.

This is also the case across Europe, where Suppliers in the Netherlands, Belgium, Norway and Germany are providing app based access to near real-time data. Further afield, the approach in Australia and the USA is following a similar path.

An obligation on ESB Networks to provide and maintain IHDs would increase costs and should only be mandated if it would be expected to deliver clear net benefits. We cannot at this stage draw on any evidence to support such a mandate and therefore agree with the CRU proposal to remove the requirement.

2.2 Response to Question 2

Targeted Approach - What are your views on requiring ESB Networks to provide an accessible IHD to those on the vulnerable customer register, who request one (for a transitionary period)?

ESB Networks does not support the mandatory provision of an IHD to vulnerable customers that request one. A mandated IHD to a subset of customers would present major cost and risk challenges for the programme.

ESB Networks considers that such a proposition would be poor value in comparison to alternative options. An ESB Networks provided IHD would:

- Be of limited value due to the lack of automated tariff information
- Would lack personalisation and therefore have a limited engagement lifespan
- Would likely require significant customer support
- Would likely lead to a significant volume of complaints and issues
- Would not drive customer switching as it only provides a snapshot of electricity usage
- Would not drive customers towards TOU tariffs as it only provides a snapshot of electricity usage

The proposal would also require a diversion of resources from ESB Networks implementation of the SMDAC which is a legislative obligation. ESB Networks notes that there is no legislative basis for the provision of an IHD and therefore does not support the diversion of resources from the SMDAC implementation.

1 *The REDUCE project on understanding household responses to in-home displays | UKERC Public Engagement Observatory | An Observatory for Public Engagement with Energy, Climate Change and Net Zero*

2 *https://octopus.energy/blog/octopus-home-mini/#howdoestheOHMwork*

The proposal would also require a diversion of resources from ESB Networks implementation of the SMDAC which is a legislative obligation. ESB Networks notes that there is no legislative basis for the provision of an IHD and therefore does not support the diversion of resources from the SMDAC implementation.

Instead, ESB Networks considers that its ongoing endeavours to raise awareness and enhance the Online Account, which is focused on providing engaging D+1 usage information that allows trends and usage to be observed over days, weeks and months to be of better value to vulnerable customers. Further, the on-line account supports access to the HDF to inform tariff choice and switching which aligns with CRU's strategic objectives and may increase customer uptake of TOU tariffs. The On-Line account adheres to accessibility standards.

It is also worth noting that an accessible IHD may not be available off the shelf and that procurement may require specific design requirements that would drive unit costs upwards.

2.3 Response to Question 3

Functionality - Should ESB Networks have flexibility to procure an IHD or a device that pairs with a smart phone application (or similar)? Have you any comments on the proposed features of the accessible solution (IHD or device with supported application) to be procured by ESB Networks?

ESB Networks does not consider it appropriate for it to develop near real-time functionality as a stand-alone app or as an enhancement to its On-line Account functionality. Our view is that market participants should be free to develop such innovations as appropriate. This innovation is evident in other markets, Next Energy in the Netherlands, Engie Electrabel in Belgium, Tibber in Norway, Uplight in the USA and the Octopus Home Mini, in Great Britain, providing excellent examples5.

Lack of price information would be a major drawback for an ESB Networks' solution and likely to affect the usefulness of the information presented. As outlined above, research4 has shown that there is often a drop-off in interest due to a lack of personalisation or perceived value.

The ESB Networks' Online account provides consumption trend information but does not include dynamic updates to price. Instead, it provides access for up to two years of consumption data that can be used by customers to identify usage trends and select the most appropriate tariff. ESB Networks recommends that its focus remains on ensuring the On-Line Account and implementation of the SMDAC meet the needs of the most vulnerable customers and that the focus remains on making this information readily available to help customers understand their usage, identify usage trends, support tariff choice and switching.

The primary relationship with electricity customers is through their electricity supplier. Suppliers are the source of tariff and billing information, and given suppliers are already providing app-based services to their customers, the most cost-efficient approach, where appropriate, is to enhance these services.

2.4 Response to Question 4

Do you agree that ESB Networks should provide technical support during the set-up process and provide ongoing support to customers for a minimum of 12 months?

As outlined above ESB Networks does not consider its provision of an IHD to vulnerable customers to be of net benefit when considering the overall economic cost, implementation timelines and operational issues likely to arise.

Further, a number of utilities across various markets are discontinuing the provision of IHDs, this includes Uplight in the USA and Octopus Energy in GB.

Ofgem's regular Energy Consumer Satisfaction Surveys show a significant body of evidence that highlight IHDs as the most common source of customer complaints and frustration in the smart meter programme [1].

In terms of offering installation and operational support to vulnerable customers, ESB Networks considers the cost and overhead of such support likely to be high and labour intensive.

Instead ESB Networks recommends that its focus remains on ensuring the On-Line Account and implementation of the SMDAC meet the needs of the most vulnerable customers.

ESB Networks proposes to enhance its existing customer facing information, available on our website, with new complementary FAQs and user guides. We consider the information available on our smart meter webpages to be well understood and is successfully supporting customers access to the ESB Networks' On-Line Account through detailed FAQs and video guides. Our view is that the next tranche of functions and services, to be facilitated by the SMDAC, will bring new benefits to all customer groups.

1 https://www.ofgem.gov.uk/sites/default/files/2025-02/Energy%20Consumer%20Satisfaction%20Survey%20-%20Interim%20Report%20of%20Findings%20January%202025%20.pdf

2.5 Response to Question 5

Have you any views on the CRU's proposal that ESB Networks would develop and deliver training to community mentors who can advise and support vulnerable customers to install and use their IHD?

As outlined above ESB Networks does not consider its provision of an IHD to vulnerable customers to be of net benefit when considering the overall economic cost, implementation timelines and operational issues likely to arise.

Ofgem's regular Energy Consumer Satisfaction Surveys show a significant body of evidence that highlight IHDs as the most common source of customer complaints and frustration in the GB smart meter programme [1].

In terms of offering support to mentor organisations, ESB Networks has already offered such support to these organisations. ESB Networks has offered assistance so that vulnerable customers could set up an Online Account and then use their smart meter data to choose the most appropriate tariff. Although the organisations expressed support for this initiative, their current capacity constraints have prevented them from accepting ESB Networks' offer. This would cast doubt on the availability of mentors to support IHD installation.

Instead ESB Networks recommends that its focus remains on ensuring the On-Line Account and implementation of the SMDAC meet the needs of the most vulnerable customers. ESB Networks continue to stand ready to offer support to community mentors on set up and use of the On-Line account.

ESB Networks proposes to enhance its existing customer facing information, available on our website, with new complementary FAQs and user guides. We consider the information available on our smart meter webpages to be well understood and is successfully supporting customers access to the ESB Networks' On-Line Account through detailed FAQs and video guides. Our view is that the next tranche of functions and services, to be facilitated by the SMDAC, will be bring new benefits to all customer groups.

1 https://www.ofgem.gov.uk/sites/default/files/2025-02/Energy%20Consumer%20Satisfaction%20Survey%20-%20Interim%20Report%20of%20Findings%20January%202025%20.pdf

3. Conclusion

ESB Networks welcomes the opportunity to respond to this consultation. We are committed to supporting the CRU on the development of the Smart Meter Upgrade programme and will continue to work closely and collaboratively with all stakeholders throughout the forthcoming stages of its further implementation.

ESB Networks remains available to discuss any aspect of this response and look forward to engaging with the CRU, and other industry stakeholders over the coming months. As highlighted in our PR6 submission ESB Networks wishes to increase its support for vulnerable customers. In this instance we do not believe that an ESB Networks provided IHD will meet the needs of our vulnerable customers for the reasons outlined in this document.

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