



ESB Networks Ltd Response to Consultation on Modification Proposal 34_09:

Global Aggregation

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Commercial and Confidential

ESB Networks Ltd.

Introduction

The Meter Registration System Operator, (MRSO), is a "ring fenced" function within ESB Networks Ltd responsible for the Change of Supplier process and the processing and aggregation of meter data within the Republic of Ireland as required by the retail market design and the SEM Trading and Settlement Code. As a Meter Data Provider, ESB Networks/MRSO welcomes the opportunity to respond to the current Consultation on the Modification Proposal 34_09 on Global Aggregation.

Objective of Data Aggregation Process

The objective of data aggregation is to provide a statement of consumption, summarised by Supplier, Supplier Unit and Supplier Sub Aggregation Code (SSAC) for Retail Market Participants and a parallel statement summarised by Supplier Unit and Generator Unit for Market Settlement. There are three types of aggregation process:

1. Aggregation of interval (QH) meter data for import
2. Aggregation of interval meter data for export (i.e. generators)
3. Aggregation of data for customers without interval meters, including Unmetered sites

No import data is aggregated to ESB Customer Supply other than where ESB CS is registered for the Import for Participant Generators.

Global Aggregation will involve the inclusion of ESB CS in the Aggregation process regardless of the option selected.

Options

1. A+ - Enhanced Balancing Cost

This option provides for the provision of data for the ESB CS Supplier Units by Meter Data Providers. This would be done by including ESB CS in the Aggregation process. There would be a requirement for some system changes however it would be the simplest option for MRSO to implement. MRSO acknowledges that this option does not provide SEMO with the level of detail required to vary the allocation of differences between interval and non interval meter volumes.

2. E – Enhanced Dual Factor Smear

Background

Mod_34_09: Global Settlement included a proposal to separate the aggregated quantities of non Interval and Interval metered data. This was proposed to be identified from the Supplier Unit which would have a new classification of either 'Non-Interval' or 'Interval'. From the subsequent Working Group meetings this proposal became known as Option D. Further Options were developed as part of the Working Group process.

High Level Assessment of Options

Providing SEMO with non interval values was the common factor in Options B, C and D with different degrees of complexities

A high level Impact Assessment indicated that Option D would be the most costly and complex option to implement for MRSO. A detailed and co-ordinated cutover plan would be required between SEMO, MRSO and Suppliers to ensure the successful migration of sites to the correct Supplier Unit. In addition, this option would increase the ongoing workload in MRSO as more validation checks need to be built into the processes. This option would also require substantial changes to the Retail Market System including Registration, Meter Works and Data Aggregation

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Option E – Enhanced Dual Factor Smear

MRSO has proposed an alternative Option (E) as a means of providing the equivalent results in a more cost effective way by utilising and amending the existing data flows to SEMO. While this option also requires additional changes to the Retail Market System, there is no impact on Registration and therefore less of an impact on MRSO. MRSO is of the opinion that this option delivers the necessary level of detail required to SEMO in order to manage the smearing of the differences.

Conclusion

For MRSO, Global Aggregation will involve the inclusion of ESB CS in Aggregation and regardless of the selected Option some system changes will be required in order to facilitate this. Including ESB CS in this process will mean that MRSO will be aggregating approx. 2.3m sites. This represents a significant increase in volume. A Performance Improvement Project is currently in progress to ensure that run times for Data Aggregation are optimised to allow MRSO to meet T&SC deadlines. Further work and performance testing will need to be carried out specifically for Global Aggregation to confirm the performance implications and identify any additional costs necessary to maintain performance levels.

Option A+ and E are both technically feasible with an associated level of time, cost and effort. While a high level assessment of the options has indicated an estimate of the work required to deliver these options, a full impact assessment will be necessary when the final option has been approved and a more detailed design is agreed. It is assumed that when the consultation concludes that there will be a discussion within the Retail Markets on the outcome and a process will be agreed to co-ordinate the timelines for changes across the markets viz the Wholesale Market and each of the two Retail Markets.

ESB Networks/MRSO supports the implementation of Global Aggregation and therefore recommends adopting either of these options A+ or E.