EUROPEAN ENERGY RETAILERS

Network of Independent Energy & Solution Providers

EER position on
METERING SERVICES AND DATA ACCESS

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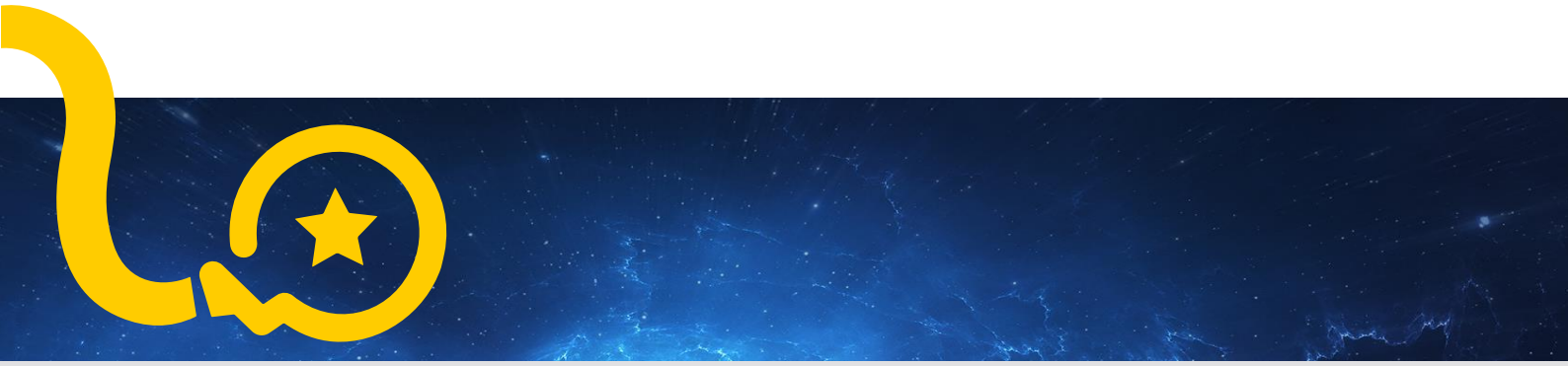

Founded in 2017 by:

ACIE: Asociación de Comercializadores Independientes de Energía / Association of Independent Retailers – SPAIN

AFIEG: Association Française Indépendente de l'Electricité et du Gaz / French independent association for electricity and gas – FRANCE

AIGET: Associazione Italiana di Grossisti di Energia e Trader / Italian Association of Energy Traders & Suppliers – ITALY

BNE: Bundesverband Neue Energiewirtschaft e.V. / Association of Energy Market Innovators – GERMANY

Oberoende Elhandlare / Independent Electricity Retailers – SWEDEN

EER position on Metering Services and Data Access

Smart meters are an enabling technology that can be used to provide services that may result in a wide range of benefits for all parties across the electricity supply chain, including consumers. Advances in metering technology, and the energy products and services this technology enables, can give consumers more choice and control. With the right technology, information and price signals, consumers are better able to decide how and when they use electricity, and manage the costs of those decisions. At the same time an increasingly decentralized energy supply system with high shares of renewable energies can be managed securely. Key to this development is **access to data** generated by **smart meters for all authorized energy market participants in an efficient, easy, non-discriminatory way and free of charge.**

Regrettably, the penetration of smart meters and the regulatory context regarding data access differs from one EU Member State to another. Moreover, the technical features, especially those related to the metering systems and the associated communication infrastructure's security architecture, vary substantially. Case in point is Germany where highly sophisticated and extremely rigorous data security requirements have led to a comparatively expensive and severely delayed roll-out of smart meters.

Countries like Spain, France or Italy show a high percentage of installed smart meters, but this does not mean that metering activity and data transmission is working well in these countries because of the following factors:

- Many of the installed smart meters are not effectively integrated with Distribution System Operator (DSO) systems for lack of hardware or regulation, so they are not really in use.
- Installed smart meters are linked to the provider systems specificities, so they are only compatible with systems of the corresponding DSO. This is creating a technical barrier for data access by independent retailers or other third-party service providers as many of the installed smart meters are not able to provide data through interaction with different technologies.
- Installed smart meters not always comply with common minimum functionalities as defined by the European Commission in its recommendations of March 2012 on preparations for the roll-out of smart metering systems (2012/148/EU).
- In some EU Member States there are delays in the access of consumption data by independent retailers and third-party service providers of up to a week. In France for instance, data from smart meters are transmitted to suppliers on D+2 while they are accessible on the DSO's website on D+1. Moreover, in self-consumption facilities independent retailers receive the consumption data but not the generation data.
- In some cases, national regulation is reserving the real-time access to smart meter data to the DSO and the consumer, but not including other market parties in the data provision rules. As a result, independent retailers and other third-party service providers may not help consumers to correctly handle their consumption habits in an efficient way and the Balancing Responsible Party (BRP) may not be able to balance their perimeter. In addition, in some countries, real-time access to data from smart meters is, by design, not foreseen for customers or suppliers. In France for example, it is necessary to connect a third-party device to get the information in real-time.

- Information barriers pose significant threats to the future energy system. Consumers will not give access to data if they are not well informed about the benefits of doing so. In this vein, the current European and national data protection regulation should not be used as an excuse for not allowing access to consumption data as there is a hiatus between data protection and the needs for managing the energy transition efficient and securely.

The choice of power line communication (PLC) as technology for data collection from meters may cause a lock-in effect in terms of data management within the DSO network. In fact, the demand response scenario is highly likely to increasingly rely on instant data which should be delivered through direct communication (possibly over Internet of Things technology) from the meter to the customers' appliances. In general, coordination must be carried out between DSOs and suppliers, including on the technical aspects of the meters. In France, with regard to the business market, the DSO has changed the data transmission technology (Internet Protocol Modem), which has created operational constraints (no direct access anymore to the modem for consumers and third-parties) that were not foreseen for the suppliers and industrial customers.

Well-functioning metering services are essential as new pillar of retail competition, including demand response management, self-consumption, balancing and aggregator tasks, so a common European regulation seems mandatory in such domain. To that end, we deeply appreciate the new European legislative framework, setting out clear provisions on smart metering (Articles 19-21 in the Electricity Directive) and data management (Art. 23 and 34 in the Electricity Directive). The related implementing acts currently under preparation and the required national implementation should not be determined by the DSO views and needs only. Indeed, the consumer´s and third-parties' needs and interests shall be considered as well. It is of utmost importance that DSOs change their perspective and start to treat retailers and third-party service providers as their customers in the overall energy market context.

Thus, EER recommends the following:

- A set of minimum services offered by metering system operators providing full access to the collected data for all market participants needs to be defined.
- Non-discriminatory, timely and efficient access to smart meter data shall be ensured (including the load curve) to all market parties that need the respective information for fulfilling their contractual and regulated duties. Direct access to data for retailers and 3rd-party service providers shall be granted based on consent by the consumer, or as defined by law or contractual agreements.
- Smart meters should be able to provide data through interaction with different technologies (Wireless; PLC; GPRS).
- Common minimum functionalities as defined by the European Commission in 2012 (2012/148/EU) need to be implemented on national level. In addition, those functionalities need to be refined further, based on a reasonable balance between cybersecurity considerations, standardization needs and implementation times while bearing in mind the costs and principles of proportionality.
- A common minimum set of data characteristics (granularity, type of data, response times, etc.) and recommended data format for accessing historic consumption data should be defined at a European level.

- A standard data format for the real-time data should be provided by the local interface on the meter and the implementation of this interface by the Member States should be monitored.
- Metering services should be open to competition. Installation, operation and collecting, processing, storing and transmission of metering data should not be a DSO exclusive task any more. Other metering and energy service providers should be enabled to start offering such services, provided that formal and metrological requirements, including data protection and cybersecurity, are fulfilled.
- If the DSO is providing metering services, it has to be done in a strictly neutral way.