NordREG recommendations for customers and market actors access to metering data and transparency

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Introduction:

The Nordic electricity market is heading towards a harmonised retail market where the most critical barriers for suppliers to establishing business in another Nordic country should be eliminated. At the same time the roll out of smart metering systems[1] means that there will be new opportunities to handle and collect detailed information of customer's electricity consumption. Historical and current consumption on-demand could easily be distributed between market actors such as suppliers, distribution system operators (DSOs), data hubs and energy service companies (ESCOs) for example. But it is important to remember that the collection of metering data from an individual's home could be seen as a violation of that person's privacy. The data that can be collected through smart metering systems is considered to be personal data according to Working Party 29[2]. Therefore it is important to be very cautious about the handling of these meter values.

To avoid confusion on the regulators view on what should be allowed in terms of access to data this document reiterates the most critical recommendations that has already been issued by the Commission, the Council of European Energy Regulators (CEER) and the European Energy Regulators for Electricity and Gas (ERGEG).[3] Some of the recommendations presented in this document have been adjusted to fit into the future Nordic supplier centric market model.

The main target groups for these recommendations on access to customer data and transparency are market actors in the Nordic electricity market that are handling any kind of customer information.

The objective of the recommendations presented in this document is to determine *basic Nordic principles for customers and market actors' access to customer data and transparency*.

Recommendations on access to information

The following principles regarding access to information should be applied for the harmonised Nordic retail market:

[1] Still to be decided in Denmark

[2] The Article 29 Data Protection Working Party was set up under the Directive 95/46/EC of the European Parliament and of the Council of 24 October 1995 on the protection of individuals with regard to the processing of personal data and on the free movement of such data.

[3] The original recommendations can be found in these documents: *Electricity and Gas Retail market design, with a focus on supplier switching and billing – Guidelines of Good Practice (C11-RMF-39-03)*
CEER Advice on the take-off of a demand response electricity market with smart meters (C11-RMF-36-03)
Final Guidelines of Good Practice on Regulatory Aspects of Smart Metering for Electricity and Gas (E10-RMF-29-05)

Recommendation 1. Regardless of the meter value management process, *full transparency of metering data from the customer perspective* is the principle. For instance, when a service provider[4] is collecting information on the customer's power capacity (kW) the customer should in this case be able to a) know that this data exists, and b) receive information on the explicit data. This recommendation should be implemented by 2015.

Recommendation 2. *It is always the customer that chooses in which way metering data shall be used and by whom, with the exception of metering data required to fulfil regulated duties*[5]. This consent in disseminating data can be withdrawn should the customer so choose. The principle should be that the party requesting information shall state what information is needed, with what frequency and will then obtain the customer's approval for this. This recommendation should be implemented by 2015.

Recommendation 3. *The customer should receive information*[6] *on actual consumption and costs, on a monthly basis, free of charge, from the supplier.* The customer (as well as those that both generate and consume electricity) should be properly informed - at least once a month - of actual electricity consumption and costs. This information should be free of charge. Accurate and frequently delivered information enables the customer to regulate the electricity consumption. The actual consumption should be displayed on the bill or another appropriate manner (for example via website). There is no requirement of billing the customer every month. With remote data reading through smart meters, information should be easily available and should be transmitted at least monthly to the relevant market actor. When communicating with the customer, the supplier should offer a choice of different channels to provide this information for free (e.g. sms, internet, call centre).[7] Suppliers need to take into account other means of communication such as paper. This could be offered at a reasonable fee. Special needs of some customers in relation to digital platforms need to be addressed[8]. The information must be presented in a customer-friendly way, bearing in mind that customers' understanding of the electricity market is key for their confidence and active participation. Implementation deadline is yet to be set.

Recommendation 4. *Access to information on consumption and cost data on customer demand, from the service provider*. On demand, the customer (as well as those that both generate and consume electricity) should be able to access information on his/her up to date consumption and injection data and costs. When communicating with the customer, the service provider should offer a choice of different channels to provide this information for free (e.g. sms, internet, call centre). Service providers need to take into account other means of communication such as paper. This could be offered at a reasonable fee. Concerning historical data, customers as well as those that both generate and consume electricity should have access to data at a frequency set nationally, free of charge. This recommendation should be implemented by 2015.

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[4] A service provider is a supplier, a distribution system operator or an energy service company.
[5] Regulated duties can be performed both by DSOs and suppliers and include issues like billing, collection of meter values, network management etc.
[6] This obligation to provide information to the customer could be fulfilled for instance by displaying information on a webpage that could be accessed by the customer.
[7] At least two of these channels should be free of charge.
[8] The aim by this is to make sure that customers with disabilities receive information in a way that they can read/understand.

Recommendations on technical aspects

Recommendation 5. In order to access metering-data NordREG recommends that the meter should be equipped with or connected to an open gateway. The customer and service provider/s (suppliers, energy service companies, etc.) chosen by the customer should be able to have access to relevant data through this gateway. This approach would not give the DSO a privileged position compared to other service providers. The gateway should be a standardised interface which would enable energy management solutions, such as home automation, different schemes on demand response and facilitate delivery of data directly, etc. For example, the gateway should allow for the installation of an in home display that could be offered by the market, e.g. ESCOs (Energy Service Companies), suppliers, hardware stores. It is the very gateway, for example a USB portal, from which metering data can be retrieved. The access to the consumption data allows the customer to have direct insight into consumption patterns. Implementation deadline is yet to be set.

Rights and responsibilities

Below we show the rights and responsibilities, according to the recommendations above.

The customer should:

- Receive information on consumption and cost at least monthly, free of charge, in a clear and concise manner.
- Have access to relevant information on consumption and cost data on customer demand.
- Receive information provided through a choice of at least two communication channels, for example an in home display, website, SMS, via smartphones. The level of detail and frequency of access to information depends on the offer the customer has chosen.

Micro generators[9] should:

- Micro generators should be provided with relevant information on injection data according to the contract at least monthly, free of charge, in a clear and concise manner.
- Have access to information on price data on demand.
- Information should be provided through a choice of at least two communication channels, for example an in home display, website, SMS, via smartphones.

DSOs (metering operators) should:

- Collect information on metering values regarding consumption and injection.
- Have open communication standards and protocols.
- Have open architecture for utility meters involving communication protocols and functionalities enabling interoperability.
- Have a duty to deliver accurate metering data (necessary for the specified purpose) in a timely manner to relevant actors.

Suppliers should:

- Have timely and easy access to information on customers metering values regarding consumption and injection.
- Have channels enabling communication on consumption and data between customer and supplier.

ESCOs should:

- Have timely and easy access to information on relevant data according to the offer between customer/micro generator and supplier.
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[9] Electricity generation installed in domestic and small commercial premises.