

31 March 2026

[tsc@cru.ie](mailto:tsc@cru.ie)

[caroline.winder@uregni.gov.uk](mailto:caroline.winder@uregni.gov.uk)

*Reference: NIE Networks response to SEM Consultation Paper SEM 24-046 'Demand Side Units: A Revised Phase 1 Solution for Energy Payments and Other Issues*

Dear Sir/ Madam,

NIE Networks, in its role as Meter Operator for Northern Ireland and Market Registration and Data Services Provider for the Northern Ireland market, welcomes the opportunity to respond to the above consultation.

Having considered the matters outlined within the consultation paper, NIE Networks key points in response to the consultation are set out below:

- There would be a significant level of change required to current market processes and systems to introduce an enduring solution for Demand Site Units (DSUs) if NIE Networks was to become Meter Data Provider (MDP) and introduce sub-metering for these sites. These changes will take considerable time to test and implement and may result in changes to both the retail and wholesale market arrangements.
- We would suggest that further engagement and working groups are necessary to provide more detail around the registration arrangements, baselining and sub-metering options as well as roles and responsibilities for the various MDPs. It may also be helpful to consider this in the context of other future schemes such as Demand Consumption Units.
- NIE Networks would require this information to allow for a more detailed impact assessment to be carried out.
- In relation to the specific question within the consultation in respect of sub-metering, NIE Networks acknowledges that sub metering may be a more accurate way to measure demand reduction than baselining or Scada, however a comprehensive assessment would be required to fully understand the feasibility and detailed implications of this.
- Whilst sub-metering may be a feasible option to measure demand reduction for DSU sites with on-site generation which may already have sub metering in place (e.g. those which are already part of an existing AGU arrangement), a detailed assessment would be required in relation to the specific details of how sub-metering might operate in relation to sites which do not have measurable on-site generation and/or where demand reduction is achieved through forgoing consumption.

- NIE Networks' view is that this assessment would need to consider the potential large volumes of both generation units and plant/equipment units associated with forgoing consumption, which may potentially be subject to sub-metering and the full implications of implementing such arrangements. This feasibility assessment should include the detailed requirements, timeframes and costs for all aspects of installation, maintenance and replacement of sub-metering arrangements, including meter asset ownership and charging arrangements.
- A cost benefit analysis of sub-metering arrangements compared to the potential alternatives of using baselining or Scada data would also be an important consideration of this aspect.

NIE Networks looks forward to further engagement with the SEM Committee in relation to these matters.

Yours Sincerely

Adelle Watson  
Billing and Data Aggregation Manager