

Leigh Greer
Utility Regulator
Queens House
14 Queen Street
Belfast
BT1 6ED

25 August 2022

Dear Leigh,

Re: Enduring Solution to Enable Energy Payments in the Balancing Market for DSUs – A Consultation

NIE Networks welcomes the opportunity to provide feedback on the Enduring Solution to Enable Energy Payments in the Balancing Market for DSUs Consultation Paper SEM-22-036 issued on 04 July 2022.

NIE Networks have reviewed the phased approaches outlined and wish to express views from a Meter Data Provider perspective, particularly in relation to Phase 2 – Implement proposed enduring solution in SEM-19-029 with existing operational metering.

Installed metering measures gross import and export and will therefore consider only what has been consumed by the individual demand site in response to any instructions to deliver a demand reduction. NIE Networks have no sight of these events in the market so would be unable to calculate the dispatched quantities.

We would suggest that further engagement and Working Groups are necessary to determine an agreed calculation in the absence of separate metering arrangements. A more detailed impact assessment would need to be carried out to determine if such a solution is possible.

A registration process for Demand Side Unit's would also need to be established and incorporated into the Retail Market rules.

We note that the consultation paper invites respondents to comment on the timeframe involved to develop and implement a solution. NIE Networks would request that a full impact assessment is carried out given the significant policy and system changes required for implementation and therefore a phased approach is welcomed.

We trust that the above views are taken into account during the decision-making process and that you continue to consult with the Meter Data Provider's throughout this process.

Yours Sincerely

Adelle Watson
Billing and Data Aggregation Manager