



Fostering energy markets, empowering **consumers**.

**CEER Draft Advice on Data
Management for Better Retail Market
Functioning**

Electricity and Gas

A CEER Public Consultation Paper

Questionnaire

Ref: C13-RMF-57-04a

26 March 2014



Respondent information

Name:

Organisation:

Type of organisation:

- | | | | |
|--------------------------|--------------------------------------|--------------------------|---|
| <input type="checkbox"/> | Aggregator | <input type="checkbox"/> | Metering operator |
| <input type="checkbox"/> | Ancillary service provider | <input type="checkbox"/> | Ombudsman |
| <input type="checkbox"/> | Balance responsible party | <input type="checkbox"/> | Power exchange |
| <input type="checkbox"/> | Clearing and settlement agent | <input type="checkbox"/> | Standardisation body |
| <input type="checkbox"/> | Customer organisation | <input type="checkbox"/> | Supplier |
| <input type="checkbox"/> | Data protection authority | <input type="checkbox"/> | TSO |
| <input type="checkbox"/> | DSO | <input type="checkbox"/> | Other (please specify): |
| <input type="checkbox"/> | Electric power grid equipment vendor | | <div style="border: 1px solid black; height: 40px; width: 100%;"></div> |
| <input type="checkbox"/> | Government | | |

E-mail

Telephone

Public consultation questions

Privacy and security

1. Customer meter data should be protected by the application of appropriate security measures that prevent unauthorised access but which allow access to parties authorised to receive it, such as DSOs/metering operators. This customer meter data protection should be ensured by (tick one box):

- Legislation/regulation
- Contract between customer and relevant parties
- Code of conduct
- Other (please specify in the comment box below)
- No opinion

Comment box (3500 characters maximum)



2. Customers retain the right to control the use of their customer meter data. Specific parties (e.g. DSOs/metering operators and suppliers) should be authorised to access that data. However, the authorisation to access that data and the terms on which that data can be used should be ensured by (tick one box):

- Legislation/regulation
- Contract between customer and relevant parties
- Other (please specify in the comment box below)
- No opinion

Comment box (3500 characters maximum)

General comments on the guiding principle: Privacy and Security (maximum 3500 characters)

Transparency

3. The relevant body (NRA/DSO/metering operator/TSO/other) shall ensure that, as a minimum, the customer has knowledge of general information on meter data management: (a) the customer's rights with regards to data management; (b) what type of customer meter data exists and what it is used for; (c) how customer meter data is stored and for how long; and (d) how both the customer and third parties get access to that data.

- Agree
- Disagree
- No opinion



4. The customer meter data which comes out of the data management processes should be transparent to the customer. Transparency should be ensured by the relevant body (NRA/DSO/metering operator/TSO/other) through (tick one or several boxes):

- Providing clarity on how information can be accessed
- Setting a maximum time period during which a customer has to wait to receive that information after having moved in to a new premises
- Other (please specify in the comment box below)
- No opinion

Comment box (3500 characters maximum)

5. The customer meter data should be transparent to a third party, to whom a customer has provided such consent. By third party we mean a party that needs customer consent to manage data, hence not a party already authorised by law and/or carrying out regulatory tasks for system operation. Transparency should be ensured by the relevant body (NRA/DSO/metering operator/TSO/other) through (tick one or several boxes):

- Providing the third party clarity on how information can be accessed
- Setting a maximum time period during a third party has access to the information
- Other (please specify in the comment box below)
- No opinion

Comment box (3500 characters maximum)



6. The relevant bodies in each country should take active steps to build customer confidence in sharing customer meter data in order to achieve energy efficiency benefits and other potential benefits.

(a) That body or bodies should be (tick one or several boxes):

- NRA
- DSO/metering operator
- Other (please specify in the comment box below)
- No opinion

Comment box (3500 characters maximum)

(b) Active steps might include (tick one or several boxes):

- Information campaign
- Use of energy advisor
- Other (please specify in the comment box below)
- No opinion

Comment box (3500 characters maximum)

7. There should be a common standard for data content, data formats and data exchange in the retail market.

- Agree
- Disagree
- No opinion

8. The common standards for data content, data formats and data exchange in the retail market should be set on (tick one box):

- European level
- Regional level (across national borders)



- National level
- Sub-national level
- No opinion

9. The data that should be standardised should as a minimum/as a starting point be (tick one or several boxes):

(a)

- Point of delivery identification data
- User and contract data
- Consumption data
- Other (please specify in the comment box below)
- No opinion

Comment box (3500 characters maximum)

(b) NRA's should ensure that appropriate arrangements are in place for the development of common standards for data content, data format and data exchange and monitoring of compliance.

- Agree
- Disagree
- No opinion

10. The general information on meter data management (as specified in draft recommendation 3) should as a minimum be published on the website of the relevant body (NRA/DSO/metering operator/TSO/other), and must be presented in a customer-friendly way.

- Agree
- Disagree
- No opinion

General comments on the guiding principle: Transparency (maximum 3500 characters):



Accuracy

11. Relevant bodies (NRA/DSO/metering operator/TSO/other) should have in place standardised measures available to the customer to enable any remaining inaccuracy concerning data management to be addressed. Those measures should include a timetable set out in *(tick one box)*:

- Legislation/regulation
- Contract
- Code of conduct
- Other (please specify in the comment box below)
- No need for standardisation processes for remaining inaccuracy
- No opinion

Comment box (3500 characters maximum)

General comments on the guiding principle: Accuracy (3500 characters maximum):

Accessibility

12. The customer (or party acting on behalf of the customer) should have easy access to his/her customer meter data. This information should be made available in a way that is standardised and through a channel of the customer's choosing (web, paper, etc.). The common standards for provision to customer of meter data information should be provided at a (tick one box):

- European level
- Regional level (across national borders)
- National level
- Sub-national level
- No need to standardise customer meter data



No opinion

13. The arrangements for accessing customer meter data should be proportionate. Subject to customer choice, access should only be provided to a party where it requires that particular customer meter data (not just any data) and where they can use it to deliver wider benefits, including to customers.

Agree

Disagree

No opinion

General comments on the guiding principle: Accessibility (3500 characters maximum):

Non-discrimination

14. To support an effective and competitive market, the data management model should not give undue preference to one stakeholder over another. Specifically in relation to smart meters, there should be non-discriminatory access to information if and where smart meters are installed.

Agree

Disagree

No opinion

General comments on the guiding principle: Non-discrimination (3500 characters maximum):



Further questions for public consultation

In addition to individual questions on the 14 draft recommendations, we also ask stakeholders to provide their opinion on the questions below:

1. Do you agree with the list of relevant stakeholders we have identified in **Section 5.1** of the paper? If not, which other stakeholders do you think should be included and why?
2. Do you agree that we have correctly identified the right categories of data – defined as ‘customer meter data’ – in **Section 4.2** of the paper, as being relevant to retail market functioning and thus within the scope of our draft advice?
3. In relation to the 5 proposed guiding principles:
 - a) Do you agree with the proposed guiding principles in **Chapter 8** of the paper? Should any be added or removed?
 - b) Do you see any conflicting principles, which can eventually create problems in the energy market?
4. Do you agree that standardisation of data content, data formats and data exchange, set out in **Section 4.3** of the paper, is important? We welcome any comments.