



NETWORKS



INCENTIVISING THE UPTAKE OF TIME OF USE TARIFFS

ESB Networks' Response to CRU's Consultation
on Incentivising the Uptake of Time of Use Tariffs
(CRU/202358)

30th August 2023



Contents

- 1. Executive Summary..... 3
- 2. Introduction 6
 - 2.1 Role of ESB Networks 6
- 3. ESB Networks’ response to consultation questions 8
 - 3.1 Response to Question 1 8
 - 3.2 Response to Question 2 8
 - 3.3 Response to Question 3 9
 - 3.4 Response to Question 4 9
 - 3.5 Response to Question 5 9
 - 3.6 Response to Question 6 9
 - 3.7 Response to Question 7 9
 - 3.8 Response to Question 8 10
 - 3.9 Response to Question 9 10
 - 3.10 Response to Question 10 10
 - 3.11 Response to Question 11 10
 - 3.12 Response to Question 12 11
 - 3.13 Response to Question 13 11
 - 3.14 Response to Question 14 11
 - 3.15 Response to Question 15 12
 - 3.16 Response to Question 16 12
 - 3.17 Response to Question 17 12
 - 3.18 Response to Question 18 13
 - 3.19 Response to Question 19 14
- 4. Conclusion 15

1. Executive Summary

ESB Networks welcomes the opportunity to respond to the CRU Consultation on incentivising the uptake of ‘Time of Use’ tariffs (CRU202358). ‘Time of Use’ (TOU) tariffs vary the charge for electricity to a customer according to the time of day that the electricity is consumed. These forms of tariff are based on the new service features introduced to customers since Phase 1 of the National Smart Metering Programme (NSMP) went live in February 2021. This data service and corresponding tariffs are also aligned to new TOU distribution tariffs that came into effect in October 2022. ESB Networks agrees that it is timely to review the uptake of TOU tariffs two years into the programme, and to identify what measures market participants may introduce to support customers to take advantage of the benefits that TOU tariffs provide. We agree with increasing the limit on the number of TOU tariffs from four to eight but recommend against extending the number further before a review. ESB Networks recommends against extending Estimated Annual Bill (EAB) to all tariffs because we consider that this would not be practicable. We do not consider that bringing forward a review of the ‘Standard Smart Tariff’ would have any significant benefit to supporting customers’ uptake and benefit from TOU tariffs. Furthermore, any implementation of a new revision of the SST (and the associated DUoS tariff structure to which it is aligned) would require significant re-planning of the existing delivery programme and will inevitably impact on Phase 2 timelines. Instead, we propose two further measures which may improve customers’ awareness and understanding of the benefits of TOU tariffs.

Since November 2022, customers with a smart meter have had access to their metering and consumption data from ESB Networks Customer Portal. The data appears in graphical representation and the customer can download a Harmonised Downloadable File (HDF) with half-hourly usage for up to two years (or from when the data was first collected if shorter than two years). Now that customers have access to this consumption data, it is timely to amend the Accreditation Framework for Price Comparison Websites (PCW) to allow for customers to compare prices in reference to the customer’s historical consumption data instead of using the national average annual consumption of 4,200 kWh.

ESB Networks understands that CRU is proposing three potential measures to provide customers with information to help them decide whether TOU tariff is of benefit to them and to compare tariffs. CRU is also calling for evidence on a fourth potential measure and requesting suggestions for further measures. CRU plans to publish a decision paper on these potential measures later this year.

ESB Networks welcomes CRU’s first proposal “to amend the accreditation framework of Price Comparison Websites (PCWs) to allow consumers to access price comparisons using their smart meter consumption data.” ESB Networks notes that there are two potential methods for a customer with a smart meter to permit access to their historical consumption data. A customer can upload the HDF file which they have downloaded from ESB Networks Customer Portal – and this method is available now. Additionally, customers should in the future be able to permit access for a price comparison website to access the customer’s consumption data directly via an Application Programming Interface (API) under the Smart Meter Data Access Code (SMDAC). ESB Networks suggests that the latter method should be the preferred choice into the future as it provides more immediate, integrated access.

ESB Networks agrees that PCWs should make customers aware with a warning message where there is less than 12 months of smart meter data available on which to develop a tariff

comparison; that the PCW will use the most recent ESB Networks load profile where less than 1% of data is missing and if in excess of 1%, inform the consumer that there is missing data, include the percentage of missing data, and ask the customer if they wish to continue. ESB Networks notes that an individual customer's profile may not align with the ESB Networks load profile and therefore, the use of the ESB Networks' load profile in place of missing data may create inaccuracies in the price comparison.

ESB Networks has no objections to the proposal that PCWs could ask customers questions about their consumption behaviour, but it may only be relevant if the customer is expecting to change their consumption behaviour or install an appliance that consumes significant electricity quantities otherwise the historic electricity consumption provided via HDF or API should be sufficient. The same approach should apply to electricity suppliers. ESB Networks has no objections to introducing the facilities to provide price comparison based on a customer's consumption data. (ESB Networks notes that the proposed date is feasible for access where it involves the customer uploading the HDF file but that access by API may not be available before the end of 2024 - coinciding with the possible implementation date of Smart Meter Data Access Code.)

CRU's second proposal is "to apply the Estimated Annual Bill (EAB) for all time of use tariffs." ESB Networks prepares standard profiles each year for standard tariffs. This provides a statistically robust allocation of consumption across each period of the year. This would not be possible for every possible tariff construct and therefore the EAB calculation would not be a robust basis for tariff comparison. Therefore, ESB Networks believes that this proposal would not be practicable and recommends instead that tariff comparisons are based wherever possible on the use of actual smart meter data, and preferably, interval data.

ESB Networks welcomes CRU's third proposal, which is "to increase the limit on the maximum number of TOU tariffs retail suppliers are allowed to offer on the market," moving the limit from four to eight at an earlier time than intended. While ESB Networks agrees with the increase to a limit of eight tariffs - providing sufficient, but not excessive, choice - we recommend that CRU review the effectiveness of the increase from four to eight tariffs before deciding on removing the limit. A review in December 2024 would provide sufficient time for CRU to publish a decision in Q1 2025.

CRU's fourth proposal is to bring forward a review of the 'Standard Smart Tariff,' with the aim of the review being to "identify whether the Standard Smart Tariff is achieving the intended objective as acting as an 'entry-level' time of use tariff, which is easily compared between suppliers." ESB Networks does not consider it appropriate at this stage to schedule a review on the structure of the Standard Smart Tariff (SST). Customer surveys that we have conducted on the uptake of TOU tariffs have not indicated any concerns amongst customers with the construct of the SST. As such, ESB Networks would not consider a review of the SST could significantly impact the uptake of TOU tariffs. In our view, the SST provides a good entry level TOU tariff. It is based upon the familiar Day/Night Tariff timings with the only addition being the Peak Hours between 5-7pm. Re-opening the design of the SST will have significant, market design, market system and meter firmware implications as each meter is configured to record the Day, Night, and Peak registers. Any implementation of a new SST would require re-planning of the existing NSMP delivery programme and will inevitably impact on phase 2 timeline. It is also expected to require changes to all Market Participants systems.

ESB Networks notes that there is some evidence that customers are reluctant to move to a TOU tariff as they are under the impression "that once you move, you can't go back". However,

while the change to meter configuration is irreversible, the new configuration doesn't constrain the type of tariff that can be designed using Interval or SST (D/N/P) register services. To address this potential barrier, CRU should consider re-emphasising (via the Supplier Handbook) that Suppliers may design tariffs which have a single unit rate for each half-hourly (HH) interval or each Register (Day/Night/Peak - D/N/P).

ESB Networks suggests that CRU review the regulatory requirements on use of the TOU Primer in the supplier handbook - Electricity and Gas Suppliers Handbook 2023 (CRU202324) - to improve the primer's effectiveness. For example, CRU could review the timing of the initial primer and the reminder; review the content of the "generic" timer; and consider extending the need for the TOU Primer and Reminder beyond 2025. Research has shown that customers who receive information from their supplier about TOU tariffs are more likely to avail of them while a customer survey conducted by ESB Networks in June 2023 found that just one in five customers recall being contacted by their supplier about TOU tariffs.

2. Introduction

ESB Networks welcomes the opportunity to respond to the Commission for Regulations of Utilities' (CRU) consultation on the on incentivising the uptake of 'Time of Use' tariffs (CRU202358).

ESB Networks' primary function is the provision of universal, affordable access to electricity, providing capacity and reliability, via the electricity distribution system, to support social and economic development across Ireland. This is as defined within its Distribution System Operator (DSO) licence.

ESB Networks has responded to each of the consultation questions *and has included wider concepts to illustrate some areas where the code may impact existing operations and compliance activities*. This submission is made on behalf of ESB Networks DAC in its capacity as the distribution system operator (DSO) as stated in the DSO Licence (2009).

ESB Networks appreciates the opportunity to respond to CRU's consultation and remains available to engage further with CRU regarding any elements of our consultation response at any time.

2.1 Role of ESB Networks

As Distribution System Operator (DSO), Distribution Asset Owner (DAO) and Transmission Asset Owner (TAO), ESB Networks works to meet the needs of all Irish electricity customers, providing universal access to the electricity system, and delivering and managing the performance of a system of almost 157,000 km of overhead networks; 26,000 km of underground cables; 800 high voltage substations; significant amounts of connected generation, including ~5.4 GW of renewable generation connected to the Distribution and Transmission systems; 2.5 million demand customers; and now several thousand "active customers" – including but not limited to domestic premises with microgeneration (a rapidly increasing number), demand side management, houses with battery storage, etc.

ESB Networks is also a key party to the delivery of CRU's National Smart Metering Programme (NSMP). To date, ESB Networks has installed over 1,400,000 smart meters in homes and small business throughout Ireland.

ESB Networks also delivers a range of services to the Irish retail electricity market serving over 2.5 million customers. It manages relationships with market participants and provides data in a timely and accurate fashion on a daily basis. It supports the wider market through the ringfenced Meter Registration System Operator (MRSO) and Retail Market Design Service (RMDS) and supports the wholesale Single Electricity Market through the provision of aggregated meter data.

ESB Networks' role in Ireland's move to net zero is pivotal and its role in the National Smart Metering Programme will enable and support visibility of consumption and power across the electricity network and customers.

Smart meters play a key role within the Clean Energy Package, particularly around the modernisation of the electricity market design and its focus on distribution network digitalisation to support the development of demand side services. As such, new obligations are set out for the distribution system operator in the Clean Energy Package relating to:



- Its role to enable more efficient wholesale market operation, as a result of distribution connected customers' active participation in wholesale markets and ancillary services;
- Its role with respect to the integration of renewables;
- Its role with respect to enabling the activities of individual customers, and communities, in their interaction with the electricity system.

Directive (EU) 2019/944 on common rules for the internal market for electricity sets out in Article 23 requirements for data management. Specifically, in Article 23 (2), that “Member States shall organise the management of data in order to ensure efficient and secure data access and exchange, as well as data protection and security.”

Time of Use tariffs are among the new service features introduced to customers since Phase 1 of the National Smart Metering Programme (NSMP) went live in February 2021. ESB Networks is keen to support the measures which will further customers' awareness of the benefits of these tariffs and considers it timely to focus attention on measures to facilitate customer's use of their own metering and consumption data to compare suppliers' offerings on Price Comparison Websites.

3. ESB Networks' response to consultation questions

3.1 Response to Question 1

Question 1: The CRU is proposing to amend the PCW accreditation framework to allow consumers to upload their smart meter data (obtained as a HDF via the ESB Networks Customer Portal) to receive a price comparison based on their actual historical electricity consumption. Do you agree with this approach? If not, why not?

ESB Networks supports the use of actual smart meter data to inform the choice of tariff by customers.

However, ESB Networks considers the use of the HDF as a potential barrier and that a better solution would be for PCWs to access a customer's smart meter data directly via an API. Access via API would simplify the logistics of a final customer authenticating themselves, granting permission, and then the third party organisation gaining access to the data on the basis of that authentication and permission, and the final customer gaining access also – this would be carried out in a manner where there is one integrated experience for the final customer through - authentication, permission, access by final customer to data, and access to price comparison information. This could be achieved through systems integration of the price comparison website with ESB Networks smart meter data access solution (while the final customer could also carry out the same steps for authentication and permission directly on the ESB Networks site if they so choose). This would remove potential hurdles for the customer, such as the need to login to the portal account, download the HDF, navigate back to the PCW, and downloading the HDF and subsequently uploading it.

ESB Networks suggests that if resources are focused on developing the systems and processes that enable an API connection between the PCWs and smart meter data this will result in more customers receiving tariff advice based on actual consumption patterns than the proposed process.

3.2 Response to Question 2

Question 2: The CRU is proposing not to put any restrictions on the minimum period of time that needs to be contained in smart meter consumption data that consumers can upload to the PCW. However, we propose that a warning message be included where consumers have included less than a year of data. Do you agree with this approach? If not, why not?

Consistent with our response to Q1, ESB Networks considers an API connection to be the best method of PCWs accessing a customer's smart meter data.

ESB Networks agrees with the proposal that PCWs must make customers aware where there is less than 12 months of smart meter data available on which to develop a tariff comparison.

3.3 Response to Question 3

Question 3: Is there anything else CRU should consider with regards to this matter?

Should an option of an API be agreed, the API would be a standard one for all its Users delivering the same dataset, rather than a scenario where ESB Networks would have to have multiple datasets to deliver depending on the end user of the smart meter data.

3.4 Response to Question 4

Question 4: In case a consumer submits a HDF containing periods of missing data, the CRU is proposing that the PCW takes the following actions:

- If the missing data accounts for less than 1% of the total dataset: the PCW must use the most recent ESB Networks load profile and calculate an estimate for the consumption during the missing period.
- If the missing data accounts for 1% or more of the total dataset: the PCW must inform the consumer that there is missing data, include the percentage of missing data, and ask if they wish to continue with the price comparison using an estimate for the missing data, as outlined above. Do you agree with this approach? If not, why not?

ESB Networks has no objections to this proposal.

3.5 Response to Question 5

Question 5: Is there anything else CRU should consider with regards to this matter?

The proposal set out in 3.4 assumes that an individual customer's profile is in alignment with the ESB Networks load profile. There may be unusual situations where this assumption is not correct; as a result, estimates based on missing data may result in greater inaccuracies in forecasting of the bill.

3.6 Response to Question 6

Question 6: The CRU would be interested in hearing whether respondents believe there is added value or not in allowing PCWs to ask consumers additional questions to identify their consumption behaviour, and tailor price comparisons. For example, whether a consumer has an Electric Vehicle. If you believe there is added value in this approach, what guidelines, if any, do you believe the CRU should implement to ensure a minimum standard across PCWs?

ESB Networks has no objections to this proposal; however, it may only be relevant if the customer is expecting to change their consumption behaviour or install an appliance that consumes significant electricity quantities otherwise the historic electricity consumption provided via HDF or API should be sufficient. The same approach should apply to electricity suppliers.

3.7 Response to Question 7

Question 7: The CRU proposes to require PCWs to implement the functionality to allow consumers to upload their smart meter consumption data (via HDF) from 1 January 2024. Do you agree with this approach? If not, why not?

ESB Networks has no objections to this proposal. However, consistent with our responses to Q1 and Q2, ESB Networks is of the view that an API connection between the PCWs and smart

meter data is a better option once available. Delivery Timeline is subject to the publication of the Smart Meter Data Access Code (SMDAC).

3.8 Response to Question 8

Question 8: Are there any other issues that you believe the CRU should take into consideration with regards to the timeline?

In relation to the CRU's proposal to require PCWs to implement the functionality to allow consumers to upload their smart meter consumption data (via HDF) from 1 January 2024, ESB Networks at this point in time does not have any other issues that it believes the CRU should take into consideration with regards to the timeline.

3.9 Response to Question 9

Question 9: The CRU proposes to amend the PCW accreditation framework to allow consumers to access price comparisons for microgeneration export tariffs between suppliers. It proposes consumers should be able to do this in one of two ways, either by submitting their actual (historical) export volume, or by submitting their deemed calculation. Do you agree with this approach? If not, why not?

ESB Networks does not currently provide export data measured in kWh (from the meter) to the customer via the ESB Networks Customer Portal. It is the actual export interval data measured in kW that is provided to registered microgeneration customers in the HDF via the ESB Networks Customer Portal. A calculated kWh view (using interval data) is available on the Customer Portal.

3.10 Response to Question 10

Question 10: Are there any other issues that you believe the CRU should take into consideration with regards to this functionality?

Considerations have been provided in the ESB Networks' response to Question 9.

3.11 Response to Question 11

Question 11: The CRU proposes to extend the requirement for an EAB to all tariffs available on the market, including time of use tariffs. Do you agree with this approach? If not, why not?

ESB Networks supports the CRU's objective of providing customers with tailored information on all tariffs, including TOU.

However, ESB Networks does not support the extension of EAB to all retail tariffs. To complete an EAB calculation, suppliers and PCWs would require specific guidance on how much consumption is to be allocated to each period of the year. This would not be practicable for every tariff option.

For standard tariffs, such as those based on MCC01 and MCC02 meter configuration codes, standard profiles are prepared each year by ESB Networks. This provides a statistically robust allocation of consumption across each period of the year. This would not be possible for every retail tariff construct and therefore the EAB calculation would not be a robust basis for tariff comparison.

Instead, ESB Networks suggests that tariff comparisons are based wherever possible on the use of actual smart meter data, and preferably interval data. In this way, tariff comparisons can be tailored for each customer based on their actual consumption. These comparisons could be coupled with tips and advice to help customers realise any benefits that are available.

3.12 Response to Question 12

Question 12: The CRU proposes to implement an EAB for all time of use tariffs from 1 January 2024. Do you agree with this timeline? If not, why not?

ESB Networks suggests that tariff comparisons are based wherever possible on the use of actual smart meter data. In this way, tariff comparisons can be tailored for each customer based on their actual consumption. These comparisons could be coupled with tips and advice to help customers realise any benefits that are available.

As discussed in our response to Question 1, ESB Networks' view is that API connectivity between the smart meter data system and PCWs is likely to be a more effective process than requiring the customer to provide their HDF. Delivery Timeline is subject to the publication of the Smart Meter Data Access Code (SMDAC).

3.13 Response to Question 13

Question 13: With regards to the methodology for calculating an EAB for all time of use tariffs, the CRU proposes to use the demand-weighted approach, which is the same that is currently used for the Standard Smart Tariff and Day/Night tariff. Do you agree with this approach? If not, why not?

For standard tariffs, such as those based on MCC01 and MCC02, standard profiles are prepared each year by ESB Networks. This provides a statistically robust allocation of consumption across each period of the year. This would not be possible for every tariff construct and therefore the EAB calculation would not be a robust basis for tariff comparison.

Instead, ESB Networks suggests that tariff comparisons are based wherever possible on the use of actual smart meter data. This way tariff comparisons can be tailored for each customer based on their actual consumption. These comparisons could be coupled with tips and advice to help customers realise any benefits that are available.

3.14 Response to Question 14

Question 14: Are there any other issues that you believe the CRU should take into consideration with regards to implementing an EAB for all time of use tariffs?

It is ESB Networks' view that calculating EABs based on actual consumption data is a first-best solution as it ensures that the customer gets the most accurate reflection of the different costs of retail ToU tariffs.

Any other solution (demand-weighted/time-weighted) is a second-best option that could lead to customer confusion.

3.15 Response to Question 15

Question 15: The CRU proposes to increase the limit on the maximum number of time of use tariffs from four to eight from 1 October 2023. Do you agree with this approach? If not, why not?

ESB Networks assumes that the new tariffs are based on interval data service to avoid implications on existing RMS and central market systems.

It is important that there is sufficient choice for customers and competition between suppliers in the design and development of retail TOU tariffs. Regulation should not prohibit or limit structures that are attractive to customers and which are innovative.

The proposed increase is a reasonable approach to enabling competition while mitigating the risk of overloading customers with too many choices too soon.

3.16 Response to Question 16

Question 16: The CRU proposes to end the limit on the maximum number of time of use tariffs from 1 April 2025. Do you agree with this approach? If not, why not?

The proposed end to the limit on the number of retail TOU tariffs risks overloading customers with too many choices only a few months after the rollout of final smart meters is expected to complete.

ESB Networks suggests that CRU review the effectiveness of the increase from 4 to 8 tariffs before making a decision on removing the limit. A review in December 2024 would provide sufficient time for CRU to publish a decision in Q1 2025.

3.17 Response to Question 17

Call for Evidence Question 17: CRU would welcome any views on whether respondents consider it appropriate to schedule a review on the structure of the Standard Smart Tariff ahead of the completion of Phase 2 of the NSMP (currently scheduled for the second half of 2024).

ESB Networks does not consider it appropriate at this stage to schedule a review on the structure of the Standard Smart Tariff (SST). Customer surveys that we have conducted on the uptake of retail TOU tariffs have not indicated any concerns amongst customers with the construct of the SST. As such ESB Networks does not consider a review of the SST to be a priority issue or one of the measures that could significantly impact the uptake of retail TOU tariffs.

In our view, the SST provides a good entry level retail TOU tariff. It is based upon the familiar Day/Night Tariff timings with the only addition being the Peak Hours between 5-7pm.

Re-opening the design of the SST will have significant, market design, market system and meter firmware implications as each meter is configured to record the Day, Night, and Peak registers. Any implementation of a new SST would require re-planning of the existing NSMP delivery programme and will inevitably impact on phase 2 timeline. It is also expected to require changes to all Market Participants systems.

It is ESB Networks view that the market and customers are best served where an MPRN is classified as MCC12 meaning interval data is shared by ESB Networks to the registered electricity supplier. This ensures that the electricity supplier has all the necessary meter data to offer a tariff that best suits their customer needs.

3.18 Response to Question 18

Question 18: CRU would also welcome views from respondents on which issues should be considered in such a review. Respondents can specifically focus on the following questions, or provide their own views:

a) Is the Standard Smart Tariff achieving its purpose to be an easy to understand ‘entry-point’ to time of use tariffs for consumers?

The SST provides a good entry level TOU tariff and has been embedded into the present Smart Metering Solution. Customer surveys that we have conducted on the uptake of TOU tariffs have not indicated any concerns amongst customers with the construct of the SST.

b) Do you have any concerns or recommendations in relation to the Day/Night/Peak structure of the Standard Smart Tariff, including the hours assigned to each time band?

In our view the SST provides a good entry level TOU tariff and has been embedded into the Smart Metering Solution. It is based upon the familiar Day/Night Tariff timings with the only addition being the Peak Hours between 5-7pm.

Re-opening the design of the SST will have significant, market design, market system and meter firmware implications as each meter is configured to record the Day, Night, and Peak registers. Any implementation of a new SST would require re-planning of the existing NSMP delivery programme and will inevitably impact on phase 2 timeline. It is also expected to require changes to all Market Participants systems.

c) In light of the proposed measure to extend the maximum number of time of use tariffs for each supplier from four to eight, do you see a continued need for the Standard Smart Tariff?

The SST provides a good entry level TOU tariff and has been embedded into the present Smart Metering Solution.

The SST is also a backstop TOU Tariff for customers whose smart meter has poor telecommunication connectivity. The SST is based on three registers and can be manually read.

It is important that the SST remains an option for all customers and should be offered by all suppliers.

d) Are there any other issues related to the Standard Smart Tariff you believe the CRU should take into consideration in a future review?

Implementation costs associated with any alternative to the SST data service will have to be taken into account.

The future roadmap for smart metering tariffs should be for those based on interval data. SST is an acceptable entry point at present.

3.19 Response to Question 19

Question 19: CRU would welcome any additional suggestions to incentivise the uptake of time of use tariffs.

Switch back to a Flat Tariff from TOU

There is some evidence that customers are reluctant to move to a retail TOU Tariff as they are under the impression “that once you move, you can’t go back”.

This is related only to the meter configuration and doesn’t constrain the type of retail tariff that can be designed by suppliers using Interval or SST (D/N/P) register services.

To address this potential barrier, CRU should consider providing re-emphasising perhaps via the Supplier Handbook that suppliers may design retail tariffs which have a single unit rate for each HH interval or each Register (D/N/P).

Effectiveness of the Time of Use Primer

The Supplier Handbook places an obligation on suppliers to take reasonable and effective steps to migrate all relevant customers to an appropriate retail TOU tariff in a timely manner.

In this regard, suppliers must provide customers who have a smart meter installed with a “Time-of-Use Primer” through an appropriate channel of communication, no more than three months after their smart meter installation.

Further, suppliers must contact customers who have not transitioned to a retail TOU tariff after each subsequent 12-month period.

A customer survey conducted by ESB Networks on behalf of the NSMP in June 2023 shows that only one in five customers with a smart meter recall being contacted by their Supplier in relation to Time-of-Use tariffs – up from 10% in December 2022 and 18% in June 2022.

The research shows that where the customer has received information from their Supplier this is effective in encouraging sign up. In the June 2023 survey, 33% of those contacted have signed up for a Time-of-Use tariff versus just 21% among those not contacted.

ESB Networks therefore suggests that CRU review the regulatory requirements in this area to improve its effectiveness. For example,

- Review the timing of the initial primer and the reminder
- Review the content of the “generic” timer
- Consider extending the need for the TOU Primer and Reminder beyond 2025

4. Conclusion

ESB Networks welcomes the opportunity to respond to the CRU Consultation on incentivising the uptake of 'Time of Use' tariffs (CRU202358). The energy sector is undergoing transformative change under the Clean Energy Package, Climate Action Plan and changing consumer preferences.

ESB Networks has a central role to play in facilitating this transformation. We aim to support customers in the transition towards being active participants in the energy markets.

ESB Networks agrees that it is timely to review the uptake of TOU tariffs two years into the programme, and to identify what measures market participants may introduce to support customers to take advantage of the benefits that TOU tariffs provide.

It should be noted that electricity suppliers and their engagement with customers is key to successfully encouraging customers to move to a TOU tariff. ESB Networks looks forward to working closely with CRU and Market Participants to ensure the successful amendment of the accreditation framework for Price Comparison Websites with the outcome of supporting customers to move to and benefit from Time of Use tariffs.

ESB Networks appreciates the opportunity to respond to this consultation and we remain available to discuss any element of our response with CRU at any time.