

UCD Energy Institute response to the CRU Smart Meter Data Access Code Consultation

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The UCD Energy Institute welcomes the opportunity to respond to the CRU Smart Meter Access Code Consultation. The UCD Energy Institute (UCD EI) is Ireland's leading research institute focussed on decarbonisation of Ireland's energy systems. UCD EI brings together researchers from a wide range of academic disciplines to tackle the challenges associated with the decarbonisation of energy. Focusing on energy systems, energy management, and energy in society, we drive Ireland's position as a world leader in the integration of renewable energy.

Access to Smart Meter Data will play an essential role in energy research. The role of energy users will become increasingly important as we transition to a decarbonised energy future, and detailed data on energy usage through smart meter data will facilitate research into consumer behaviour. Some particular comments in relation to the consultation are outlined below.

- We welcome the inclusion of Higher Educations Institutions as a User Category to be included in the Data Access Register.
- Once the governance arrangements are confirmed, clarification will be required around the approval process for access to data for HEIs and whether a request must go to the Code Panel. In the current drafting of the Code, Schedule 2: Section 2.5 outlines that "the Code Manager shall decide if the application should be approved or rejected based on its assessment of the criteria and shall advise the applicant of the outcome including the rationale for any rejection". Schedule 2: Section 4.3 outlines that the authorised purposes for use of the data are those "approved by the Code Panel".
- The security requirements for non-personal data should be less onerous than those required for personal data. UCD, and other research institutions, take data management and security very seriously and has a strong Data Management Policy. All research data is subject to research ethics review and more information can be found here: <https://www.ucd.ie/researchethics/informationforresearchers/researchethicsdatamanagement/an>
- The twenty-four-hour, day, peak and night register, half-hourly interval, event and instrumentation data that will be stored in the Smart Meter Data system will be particularly useful to UCD researchers in developing electricity use profiles associated with different technologies, such as EVs and heat pumps, and a range of electricity tariffs. The nature of electricity use has changed over the last decades with increased electrification of heating and transport and smart controls. As the electricity system evolves to one with very high renewable electricity penetration, demand-side flexibility is becoming a key part of the electricity system. Without detailed, frequent data of individual electricity use, it will not be possible to model the impact of demand response in the electricity system.

