An Coimisiún um Rialáil Fóntais
Commission for Regulation of Utilities

Gas PAYG Meter System Replacement Project:

Decision on the Detailed Design

Decision Paper

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CRU Strategic Plan 2025-27

Executive Summary

In November 2025, the CRU published a Consultation Paper on the Detailed Design of the Gas Pay-As-You-Go Meter System Replacement Project. This Detailed Design Consultation Paper followed the High-Level Design Decision Paper which had been published in June 2025. The CRU received nine responses to the consultation and has carefully reviewed and considered all the feedback that was submitted in reaching this decision.

The current gas PAYG meters are coming to the end of their life due to ageing and must be replaced. Severe weather events and the COVID-19 pandemic also illustrated the limitations of the current system, such as the inability of customers to top up remotely and difficulties in increasing emergency credit.

In 2023, a CRU decision was made not to progress with a Smart Metering programme for gas customers but noted at the time that this may be reviewed again in the future. The CRU subsequently instructed Gas Networks Ireland (GNI) to commence the planning and design for a new PAYG solution for prepayment gas customers. In response, GNI set-up a working group including PAYG gas suppliers and have been working with them to plan and design a new PAYG meter solution.

In December 2024, the CRU published a consultation paper on the High-Level Design of the Gas PAYG System Replacement Project. This consultation presented a high-level overview of the proposed design of the project on topics such as the meter system options, data collection, project responsibilities and costs, and new features the replacement system is expected to have. Respondents were asked to share their thoughts on the proposed design, and if there would be any other features they would like to be included in the replacement system. The CRU's Decision Paper on the High-Level Design of Gas PAYG System Replacement Project was subsequently published in June 2025.

As outlined by the CRU at the High-Level Design stage, a further consultation was required to reach decisions on the more technical aspects of the project. The Detailed Design Consultation Paper was subsequently published in November 2025, with the paper focusing on three main aspects of the replacement gas PAYG meters:

- The meter system to be chosen (Thin or Hybrid meter system);
- The customer experience with the replacement meter system (such as balance messaging, topping-up, and disconnection/reconnection protocols);
- The prioritisation of the replacement meter roll-out (whether certain customer cohorts should receive the replacement meters first).

The new gas prepayment meters will ensure the continuation of the Pay-As-You-Go service for gas customers, maintaining the ability to top up at a retail outlet while also introducing the option to top-up/vend online. Without this replacement project, the current meters will become obsolete, and a gas prepayment meter will no longer be an option for customers. These meters also provide the added benefit of giving customers extra time to top-up/vend once their balance runs out to avoid disconnection, and, customers will not be disconnected during designated friendly credit periods, in line with the requirements set out in the Suppliers' Handbook[1].

This decision paper will allow for the progression of market design work, detailed IT design work, and ultimate project delivery. The rollout of the new meters is expected to begin in 2027 and will take around 4 years for the approximately 110,000 PAYG gas customer meters to be replaced.

[1] CRU Electricity and Gas Suppliers' Handbook, section 9.4.3 *"…disconnection must not occur during any Friendly Credit Periods that may apply (for electricity and gas)" and CER/15/136 ".. The disconnection will not occur during any Friendly Credit Periods that may apply (for electricity and gas)"*

Public/ Customer Impact Statement

The new gas Pay As You Go (PAYG) meters will ensure the continuation of a Pay-As-You-Go service for gas customers and enable customers to top-up/vend online as well as in a retail outlet.

The new gas PAYG system, which will operate using Advanced Metering Infrastructure (AMI) technology, will be fundamentally different in some respects from the existing prepayment solutions. The most fundamental changes will be that PAYG customers will now be able to top-up/vend online, will receive their regular balance messages through their supplier provided web facility, app etc, and, customers will only be disconnected (for non-payment) when they have two midnight balances on their account of zero. Deployment of the meters is currently due to commence in 2027 and suppliers/GNI will contact customers in advance of meter deployment to inform customers when they will receive their new meter, how to use their new meter and, what this means for them.

The total cost of this project is expected to be €111 million, with approximately 60% of the cost recovered by GNI (via network tariffs) and the remaining approximate 40% of costs covered by suppliers. This total cost includes the procurement of the replacement meters, IT costs, supplier software system costs and meter maintenance over a 20 year period.

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Glossary of Terms and Abbreviations

Abbreviation or Term	Definition
ESBN	Electricity Supply Board Networks
GNI	Gas Networks Ireland
NSMP	National Smart Metering Programme
PAYG	Pay-As-You-Go
GPAYG	Gas Pay-As-You-Go
RBMs	Regular Balance Messages[2]

[2] Sent by suppliers to their customers at least weekly

1. Introduction

1.1 Background

1.1.1 Context

In July 2012, the CRU published its decision to roll out electricity and gas smart meters for all residential and small business customers. The National Smart Metering Programme was originally a plan to upgrade how electricity and gas retail markets operate, in order to improve levels of service for all customers. The plan involved replacing mechanical meters with new digital meters which would offer customers a range of new functions and services. The CRU concluded the High-Level Design for the NSMP in October 2014.[3] The rollout of smart meters for electricity customers began in 2019, with ESBN recently meeting the 2 million installations milestone.

In 2022, the CRU received a submission from Gas Networks Ireland (GNI) in which they did not recommend investing in a mass smart meter deployment project for gas customers. Based on the content of the submission, the CRU was not confident that the rollout of gas smart meters would deliver sufficient benefits to gas customers considering the significant costs it would incur. However, this decision may be revisited in the future at a point in time when the CRU is provided with sufficient information regarding the benefits of smart metering for gas customers in line with EU legislation.

Nevertheless, in recent years it has become evident that the current gas PAYG meter system must be replaced. Firstly, during extreme weather events and the Covid-19 pandemic when travelling to a nearby retail outlet to top-up/vend credit was more difficult for customers, it became evident that an online top-up/vend option would be necessary going forward. Secondly, during the energy crisis following the war in Ukraine, implementing a CRU decision to increase emergency credit for PAYG customers became difficult as the current system only has intermittent contact with GNI's systems (the meter only receives and sends messages to GNI when a customer interacts with the meter for example, by topping-up and inserting their gas card). Thirdly, the current meters supporting the PAYG system are ageing and approaching end of life. Therefore, to ensure gas customers can continue to avail of a prepayment service (both lifestyle and hardship), the meter system must be replaced.

[3] CER/14/046 High Level Design

This Decision Paper seeks to build upon the foundations of the project arrived at in the CRU Decision on High-Level Design published in June 2025, allowing key design features of the replacement system to be established ahead of GNI and gas suppliers progressing the detailed design throughout 2026 and subsequent deployment of meters due to commence in 2027.

The High-Level Design Decision Paper set out some of the key features of the project, such as the division of stakeholder responsibilities throughout the project, the project's budget, the transition plan into the new meter system, the commencement of a customer communications strategy and the meter's hydrogen-blend capabilities.

Thereafter, the CRU commenced a consultation on the detailed design aspects of the project including the preferred meter system, the granularity of meter-read data, alternative meter solutions for customers in low-connectivity areas and meter self-disconnection and reconnection timelines, among others. These topics, and the decisions CRU has reached on them following feedback received throughout the consultation process, are set out in this paper.

1.1.2 Gas PAYG Meter System Replacement Project: Decision on the Detail Design

On 10th November 2025, the CRU published its consultation on the Detailed Design of the Gas Pay-As-You-Go Meter System Replacement Project. The paper posed 23 questions in total, across the following three main aspects of the replacement meter project:

- The meter system to be chosen (Thin or Hybrid meter system);
- The customer experience with the replacement meter system (such as customer messaging, topping-up, and disconnection/reconnection protocols);
- The prioritisation of the replacement meter roll-out (whether certain customer cohorts should receive the replacement meters first).

In total, the CRU received nine responses to the consultation. No response was marked confidential and as such, all responses are published alongside this decision paper on the CRU website. A list of parties who submitted a consultation response is provided below:

- Bord Gáis Energy (BGE)
- Electric Ireland
- Electricity Association of Ireland (EAI)
- Energia
- Flogas Natural Gas Ltd
- Gas Networks Ireland
- Saint Vincent de Paul (SVP)
- SSE Airtricity
- Yuno Ltd

Following careful consideration of all the responses, the CRU sets out in this paper, its decisions regarding the main themes in the consultation.

Overall, respondents were broadly supportive of the new gas prepayment meter system and acknowledged that the new system will provide gas prepayment customers with a better customer experience.

This paper sets out the topics consulted upon, the responses received, and the CRU decisions.

1.1.3 Gas PAYG Working Group

In July 2023, GNI established a gas PAYG Working Group which includes technical experts from both gas suppliers and GNI. So far, the working group has developed a set of high-level requirements and a design outlining the features the new PAYG system should have. This includes the customer experience features, the system architecture and the contractual frameworks that need to be put in place for a new gas PAYG meter system. The working group and GNI have been meeting regularly, carrying out research and meeting with meter vendors to assess the kinds of PAYG meters available on the market.

In December 2023, the gas PAYG working group collaborated with GNI to prepare a PAYG Recommendations Report which was submitted to the CRU, setting out the type of metering system they recommended to replace the current system.

In April 2024, GNI and the working group also submitted a High-Level Design document which set out the features that should be included in the new system. This provided guidance for GNI's gas meter procurement process and set out the changes that would be required to the existing retail market design.

In June 2024, the CRU wrote to GNI to confirm the CRU's support for the approach set out in the High-Level Design Document.

In June 2025, GNI proposed that the original PAYG Working Group would be re-named as the 'Market Design Working Group', with three subordinate technical groups created to deal with certain aspects of the project which are better discussed among relevant experts from suppliers and GNI. These three subordinate groups were accordingly for: IT Integrations, Customer Care & Communications, and Project Management & Implementation. These subordinate groups began meeting across 2025. Any decisions made at Working Group level are referred to CRU, who shall then adjudicate and inform the working group of its decision. The working group is obliged to incorporate any such CRU decision into its outputs.

1.1.4 Related Documents

- CER National Smart Metering Programme – Smart Metering High Level Design (CER14/046)
- CER National Smart Metering Programme Rolling out New Services: Smart Pay As You Go (CER15271)
- CER National Smart Metering Programme Rolling out New Services – Time of Use Tariffs and Smart Pay As You Go (CER15136)
- Upgrade on the Smart Meter Upgrade (CER17279)
- Smart Meter Upgrade – Consultation on Smart Pay-As-You-Go (CRU21046)
- Smart Meter Upgrade – Decision on Smart Pay-As-You-Go Policy (CRU21109)
- Electricity and Gas Suppliers' Handbook 2023 (CRU202324)
- Gas PAYG Meter System Replacement Project – Consultation on the High-Level Design (CRU2024142)
- Gas Prepayment Meter System Replacement Project: Decision on the High-Level Design (CRU202561)
- Gas PAYG Meter System Replacement Project: Consultation on the Detailed Design (CRU2025177)

2. Selection of Meter System

This section decides the approach to be taken in the event that a hybrid meter provider is selected through GNI's tendering process, as well as alternative meter solutions for customers who may be unable to access the new system.

2.1 Thin or Hybrid Meter System

CRU Consultation

It was noted in the CRU's High Level Design Decision Paper (CRU202561), that through GNI and its working group's research, a small number of meter system vendors on the market could offer a hybrid meter solution. This system would have the capability to work in both Thin/Connected mode and Thick/Non-Connected mode[4]. As noted in the High Level Design Decision Paper, two suppliers had expressed their support for a 'hybrid' meter solution in their consultation feedback, with the CRU deciding to consult further on the possibility of a 'hybrid' solution should such a meter provider emerge successful from the tendering process.

Following this, the CRU proposed in the Consultation on the Detailed Design (CRU2025177) that should a hybrid meter solution be selected, the meter should run in 'Thin/Connected' only due to lower system running costs, less risk of project delays, and greater security regarding meter procurement.

As such, the CRU posed the following question:

1. In the event that a meter with hybrid functionality is selected via GNI's tendering process, do you agree with the CRU's proposal that the meter should operate solely in 'Thin/Connected only' mode?

Responses Received

The majority of responses received were supportive of the replacement meters operating solely in 'Thin/Connected only' mode. These responses cited that the meters operating in

[4] A thin (connected) PAYG system communicates with the supplier through an embedded SIM card in the meter, meaning it relies on a mobile network, and all balance calculations happen centrally on supplier and GNI systems. A thick (non-connected) PAYG system which is what the current meter operates in, stores credit locally on the meter/top-up card and calculates the customer's balance directly on the meter itself, without needing network connectivity.

'Thin/Connected only' mode would produce costs savings by avoiding the need to run two concurrent gas PAYG systems and allow for a more straightforward and intelligible product to be offered to customers. Furthermore, it was noted that operating the meters in 'Thin/Connected only' mode would enable greater supply-chain resilience should an alternative vendor for gas PAYG meters be needed in the future, due to the limited number of vendors offering meters with hybrid functionality.

However, other responses favoured the ability for meters to operate with hybrid functionality, i.e. 'Thin/Connected' and 'Thick/Non-connected' mode. These respondents favoured this functionality as it would offer closer continuity to the current gas PAYG product used by customers, could be used by customers in lower connectivity areas, could provide a lower barrier to entry into the gas PAYG for any prospective new suppliers, and potentially offer the ability for meters to switch for 'Thin/Connected' to 'Thick/Non-connected' mode in extreme weather events.

CRU Commentary

The CRU notes broad agreement from respondents that the meter should run in 'Thin/Connected only' mode. Although the hardware cost of a hybrid meter is broadly similar to that of a Thin/Connected-only meter, maintaining two systems in parallel would be significantly more expensive with separate systems needing to be designed, built, and operated by both GNI and gas suppliers, increasing overall project costs. These additional costs would ultimately be passed on to all gas customers, as they would be socialised. Running dual systems could also delay the project, given that all preparatory work to date has been focused on a Thin/Connected-only solution. With existing PAYG meters nearing the end of their limited lifespan and no longer being manufactured, it is critical that the replacement system is introduced without delay.

CRU Decision

The CRU has decided that, in the event of a meter with hybrid functionality being selected in GNI's meter tendering process, the meter will run in 'Thin/Connected only' mode.

2.2 Alternative Meter Solutions

CRU Consultation

In the consultation, the CRU acknowledged that it is likely that a small cohort of customers may be unable to avail of the new meter due to network issues, customers not having access to the internet to view their balance, or other customers who may not wish to avail of the new Thin/Connected system for various reasons.

The consultation also noted that GNI is exploring options to assist customers who may be in low cellular strength areas but for some of these customers the best option may be moving to a credit meter.

On this topic, the CRU posed the following question:

- Do you have any feedback on the issues which may lead to customers not being able to avail of the new PAYG system? If so, do you have alternative suggestions on what could be done to help provide the new PAYG solution to all customers?

Responses Received

There were varied responses regarding what could be done to help provide the new PAYG solution to all customers. Given that low connectivity issues would be the most likely reason for a customer to be unable to utilise the replacement meter system, the majority of responses requested that a 'lessons learned' exercise be conducted with ESB Networks on how such connectivity issues were dealt with in the electricity Smart PAYG programme; such that if there are ways in which a customer's connectivity can be enhanced for them to avail of the replacement meter, they should be shared.

In scenarios where a customer's connectivity cannot be improved to sufficient levels, some respondents outlined their opinion that these customers should be allowed to remain using the current gas PAYG meter, or be given the option to move onto a credit (billpay) solution.

CRU Commentary

The CRU acknowledges responses that seek assurance that the replacement meters can be offered to as many existing gas PAYG customers as possible. Given that the CRU has decided the replacement meters should operate in 'thin/connected only' mode GNI has engaged with ESBN on the matter, due to their previous experience of installing smart meters for electricity customers, which also operate remotely. GNI will continue to engage with ESBN on any lessons that can be learned from the deployment of electricity smart meters, such as developing signal strength scoring charts (based on ESBN's smart meter connectivity data) for likely ability to avail of the replacement meters in particular geographic areas prior to deployment commencing. In some scenarios, signal-boosting antennae could be configured to the meter which may allow customers to avail of the replacement meter.

The CRU also acknowledges that wider lessons should be leveraged from the deployment of electricity SPAYG meters, including enhanced customer support lines for customers experiencing any difficulties with their new meters. The CRU requires GNI and suppliers to engage on the matter of enhanced customer care provision when the replacement meters are

installed, similar to ESBN's 'Hypercare' support service in electricity smart metering, with further discussions regarding this to take place with ESBN closer to meter deployment.

Notwithstanding the above, it is likely, as mentioned previously, that for a small cohort of customers there may be no other solution but to switch from gas PAYG to a credit meter (free of charge). Nonetheless, the CRU expects GNI to continue to pursue alternative solutions to facilitate existing gas PAYG customers to avail of the replacement meters.

GNI is also planning a six-month pilot scheme of the replacement meters before full deployment commences, during which potential solutions for customers with insufficient signal strength can be tested and evaluated.

CRU Decision

The CRU has decided that GNI will continue to engage with ESBN to take on lessons learned from ESBN's experience in deploying its smart meters and in particular to explore options and solutions to ensure as many GPAYG customers as possible can avail on the new solution. In particular, the CRU requires GNI and suppliers to engage on the provision of enhanced customer care (such as dedicated phone support lines) once the installation of the replacement meters has commenced.

As mentioned above, it is possible that no solution can be found which would allow a small cohort of PAYG customers to avail of the replacement meters, meaning these customers may have no option but to switch to a credit meter.

3. Customer Experience

This section sets out the proposed new meter system's customer experience, in areas such as customer messaging, disconnection and reconnection timelines, customer top-up, and meter reading, among others.

3.1 Disconnection & Reconnection Timelines

CRU Consultation

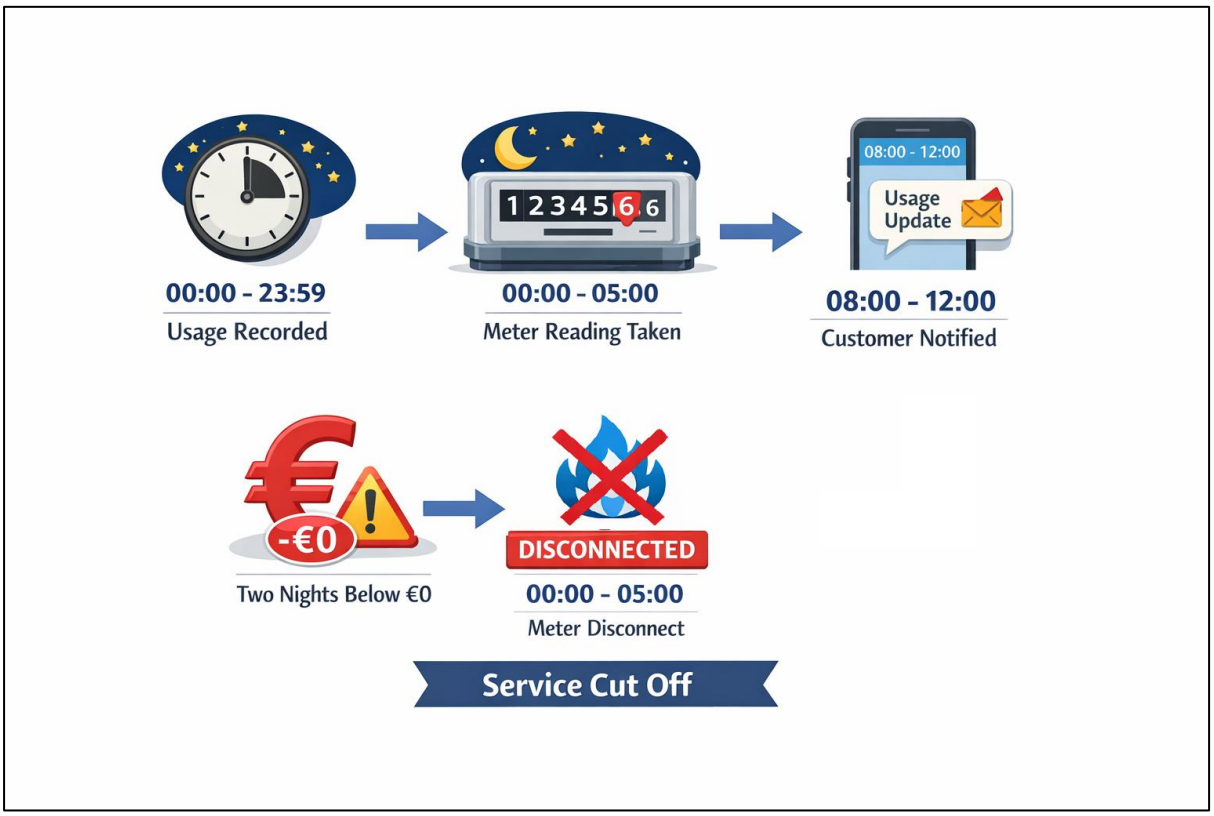
A fundamental feature of the replacement meter system will be the ability for customers to top-up/vend remotely. The meter will also allow for remote disconnection and reconnection. In its consultation, the CRU set out the differences between the existing meter system and the potential new meter system. Specifically the matter of meter 'wake-up' (i.e. the timing of the meters to send/receive signals and meter reads each day) to facilitate the receipt of meter information by suppliers to update customer account information, enable the sending of low balance/disconnection warning messages to customers, and, where appropriate, to disconnect or reconnect customers.

The CRU consulted on the following options:

- **Proposed PAYG Meter 'Wake-Up' Time:** Meters will record consumption for a given day (Day 'D') between 00:00 and 23:59. The corresponding meter readings for that usage period will then be gathered between 00:00 and 05:00 on the following day (Day 'D+1'). Customers will be able to view their updated balance by midday (12:00) on Day 'D+1'.
- **Self-Disconnection Warning Messages:** Customers receive at least one self-disconnection warning message when their balance goes below a certain (€) threshold;
- **Overnight self-disconnection:** Where a customer has a balance below €0 for two consecutive reads, they would then be disconnected (i.e. self-disconnect) between midnight (00:00) and 5am (05:00).

  The infographic below illustrates what the disconnection timeline for a GPAYG customer with the replacement meter will be:[5]

[5] Disconnections must not occur during any Friendly Credit Period. Accordingly, any scheduled disconnection will be deferred until the Friendly Credit Period has ended.



- **Multiple Daily PAYG 'Wake-Ups':** It may be technically feasible for a second meter wake-up to occur in the middle of the day for all meters or just those that have a self-disconnection command queued. This would allow self-disconnections to occur at times during the day rather than at night;

- **Alternative PAYG 'Wake-Up' Times:** It is proposed that PAYG meters would wake-up between 00:00 and 05:00 daily (and self-disconnect at this time if a customer has two consecutive reads below €0) and provide an updated balance to customers between 08:00 and 12:00 daily. The consultation sought feedback from respondents on whether an alternative meter 'wake-up' time would be preferable, but outlined the subsequent effects this would have on when customers would receive balance updates, and when self-disconnections would be actioned;

- **Swift reconnection:** In accordance with CRU's 2015 decision on PAYG services (CER15271), a customer that has self-disconnected should be re-connected within 45 minutes of topping-up by an appropriate amount.

In its consultation, the CRU posed the following questions on this topic:

1. What are your thoughts on the proposed meter ‘wake-up’ time of 00:00 and the consequent timeline for customers receiving balance messaging? If you do not agree with this proposed meter ‘wake-up’ time, please provide reasons why not?
2. Do you agree with the CRU’s proposed backstop time for reconnection?
3. Do you have any other relevant views/suggestions?

Responses Received

On the matter of meter wakeup times, the majority of respondents agreed with the CRU’s proposed meter wake-up time of 00:00, although some concern was noted on the possibility of disconnected customers waking up to a cold house due to this meter wake-up time (when disconnections would also take place). In this regard, respondents were in favour of the possibility of a second meter wake-up occurring for customers that have a disconnection queued, thus allowing disconnections to take place during daytime. Respondents stressed the importance of customers receiving balance updates in as timely a manner as possible to ensure sufficient time to top-up/vend. Finally, respondents highlighted that every effort should be made to ensure customers who wait to top-up/vend until just before the meter wakes up and is due for disconnection, have their top-up/vend processed quickly to avoid the disconnection.

On the matter of reconnection timelines, the majority of respondents were not in agreement with the CRU’s proposed backstop time for reconnection of 45 minutes. Respondents here requested that the backstop time for reconnection be one hour and 15 minutes, as it is for electricity Smart PAYG. Respondents pointed out that reconnection may be dependent on information regarding the customer’s top-up/vend being received from a third-party (depending on the payment channel the customer used to top-up/vend), as well as the customer interacting with the meter following their top-up/vend. On this note, respondents sought to highlight that the time it takes for them to receive confirmation of the customer’s top-up/vend be excluded from the overall backstop timeline.

On this topic, respondents also called attention to their wish for GNI to agree a framework of Service Level Agreements (SLAs) that any upgrades and maintenance required for the gas PAYG system take place outside of the main periods of high gas usage (such as during the coldest months of winter).

Finally, one respondent raised the matter of contingency plans for scenarios whereby a customer has topped up but are still unable to reconnect.

CRU Commentary

In relation to the matter of a second meter wake up, the CRU agrees with respondents and believes that the second mater wake-up functionality would be beneficial for customers. As such, the CRU requires GNI to explore the technical feasibility of this.

Regarding the topic of the backstop meter reconnection time, the CRU notes that most respondents sought an extension of time to the 45 minutes proposed. Respondents stated that additional time is needed to allow suppliers to receive top-up/vend confirmation from any third-party vending intermediaries (should a customer top-up/vend in a retail outlet), as well as mirroring the meter reconnection time in electricity SPAYG of one hour and 15 minutes.

The CRU is aware that it may take some time for suppliers to be notified of a customer top-up/vend by the payment service provider (particularly when the customer tops-up in a retail outlet rather than online) and would also like to facilitate a consistent customer experience across electricity SPAYG and Gas PAYG. The CRU is also aware that the reconnection process will require two actions from the customer with the meter – firstly to press a button on the meter which will facilitate the top-up being received by the meter, and secondly to confirm that all gas appliances are turned off in the house prior to connection being restored. Therefore, the CRU is setting the meter reconnection time to one hour and 15 minutes from the moment the customer tops-up/vends.

Although respondents highlighted that there may be scenarios where there may be delays in the supplier being informed of the customer topping-up, the CRU believes that suppliers must minimise such occurrences by ensuring that SLAs are in place with third-party vending providers whereby the supplier receives confirmation of a customer's top-up/vend within 30 minutes. As mentioned in the CRU consultation, the reconnection timeline is not inclusive of the final reconnection step whereby the customer must be present at the meter, due to safety reasons.[6]

Furthermore, the CRU supports respondents' wish that upgrades or maintenance work of the gas PAYG system take place outside of core hours and, where possible, not during the coldest months of the year when it may be expected that customers are topping-up more frequently. GNI already has SLAs in place that aim to prevent system work, such as maintenance and upgrades, occurring during the peak gas-usage months of December and January, and will continue to endeavour to avoid any such work on the gas PAYG system taking place at core hours of gas usage or during months when gas usage is at its peak (such as December and January).

[6] A customer must be present at the meter when it's reconnected to ensure all gas appliances are turned off.

The potential issue cited by one respondent of customers topping-up but being unable to reconnect due to a communications issue between GNI and the meter, has also been considered. In such scenarios (which are expected to be rare), customers will be able to use their emergency credit by contacting their supplier who will provide them with a code to key into their meter allowing them to avail of gas usage until the issue with the meter communication and their top-up/vend is resolved. The amount of gas used would then be paid off as emergency credit as part of the customer's subsequent top-up/vend.

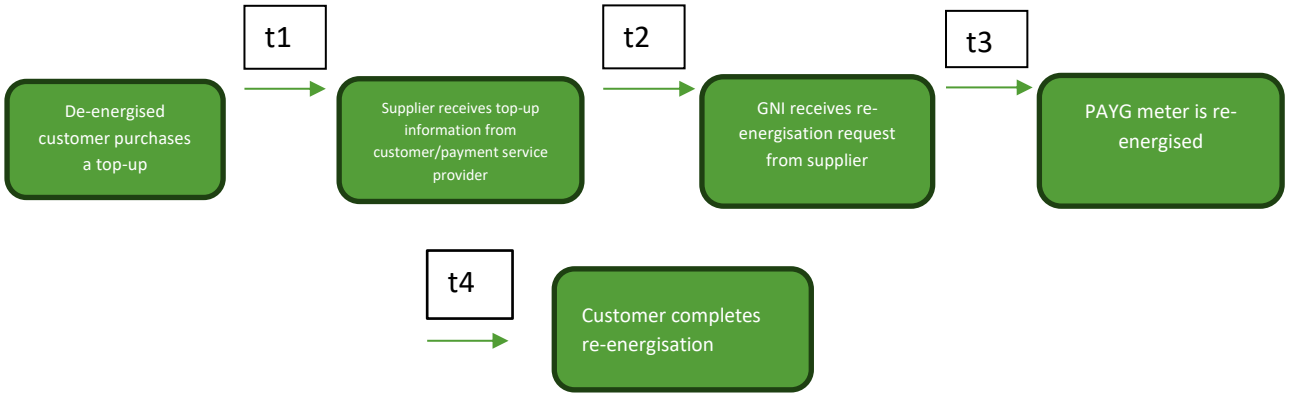
On the issue of customers topping up just before their meter is due to wake up (where a disconnection request is already queued); GNI has stated that while a top-up made before midnight may lead to the disconnection not proceeding, this cannot be guaranteed. The timing depends on how promptly the supplier receives the vend confirmation and subsequently cancels the queued disconnection before the meter wakes-up.

CRU Decision

The CRU has decided that:

- The meter wake-up time will be set at midnight (00:00) daily, with data recorded for the period of midnight to 11:59pm the previous day being gathered between midnight (00:00) and 5am (05:00) each day by GNI;
- If technically feasible (i.e. if the meter manufacturer can provide for it within GNI's procurement process), there will be a second meter wake-up configured for customers with a disconnection request queued to facilitate disconnections to take place at times other than during the night. If this is not technically feasible however, then a midnight to 5am disconnection process will take place as set out above;
- Any upgrades or maintenance work by or on behalf of GNI of the gas PAYG system will, where possible, take place outside of core hours and, not during the coldest months of the year. This is to minimise any GPAYG system downtime or the risk of supply interruption for customers.
- The CRU has also decided that the backstop meter reconnection time will be one hour and 15 minutes from the moment when the customer tops-up, with the supplier responsible for the time between the top up and the message to GNI to reconnect (t1 and t2 in the figure below) and GNI responsible for t3 (in the figure below), with the following backstop times:

- Suppliers will be responsible for ensuring that they set up appropriate SLAs with payment service providers to ensure that a supplier is notified of a purchase within 30 minutes.
- Suppliers will be responsible for ensuring that the remote re-energisation request is successfully sent to GNI within 30 minutes following a successful purchase, irrespective of the top-up/vend channel, including cash top-up/vend in a retail outlet.
- GNI will be responsible for remotely re-energising any GPAYG meter within 15 minutes of receiving a re-energisation request from the supplier.



This allows for a total backstop reconnection time of one hour and 15 minutes. This timeline is not inclusive of the final step (customer completing the re-energisation) as this is dependent on the customer being at home for safety reasons.

3.2 Balance Messaging

This section of the consultation set out how balance messaging on the new meters will operate.

The replacement meters will be powered by a battery. As a result, and to prolong the battery life of the meter, GNI proposed that the meter will communicate with GNI once every day. This communication will send GNI (and then onwards to the suppler) consumption data, battery status and any alarm data (e.g. low battery). The communication will also allow the meter to receive any valve open/close commands (e.g. to disconnect or reconnect a customer).

Under the new meter system, customers may no longer be able to view their gas credit balance directly on the meter.[7] In any case, suppliers will be required to provide an online platform for PAYG customers to access their balance. Suppliers may also offer additional options such as mobile facility or phone-based services to support balance enquiries.

The consultation set out the CRU's proposals in the following areas:

3.2.1 Regular Balances Messages

CRU Consultation

The CRU proposed that for gas PAYG customers, suppliers must, at a minimum, send weekly Regular Balance Messages (RBMs)[8]. The CRU also stated it favours suppliers including in the RBM how long the customer's current credit will last where this estimate is less than 10 days, based on the customer's previous usage patterns. In addition, suppliers would be required to agree a suitable communications channel with the customer at sign up for these communications. Customers should also be given the option for up to one additional household member (or person nominated by the customer) to receive these RBMs.

As such, the CRU posed the following questions on this topic:

1. At what intervals do you believe it is best to send messaging regarding the customer's balance?
2. Do you agree with a balance estimate being included in the RBM should less than 10 days estimated usage (based on the customer's previous consumption patterns) be remaining?
3. Do you agree with the CRU's proposal not to mandate any specific channel of communication for the sending on RBMs?

Responses Received

On the matter of the timing of the RBMs, almost all respondents were of the view that the intervals for the sending of RBMs should align with that of electricity SPAYG, i.e. they should be sent weekly by default but that the customer may opt for more regular RBMs if they so wish. This

[7] GNI has not yet completed its vendor selection for the new meters.
[8] Regular Balance Messages (RBMs) are regular messages received by customers from their suppliers through pre-agreed channels such as a text or an app that contain the customer's most up to date credit balance

would make for a more consistent customer experience across gas PAYG and electricity SPAYG. One respondent requested that, by default, RBMs (and other low balance alerts) be sent at the 'credit friendly' hours of 10am in summertime and 9am in wintertime to provide customers more time to top-up/vend. One respondent advocated for a more principles-based, rather than prescribed approach to sending of RBMs and other balance alerts to customers, with another supplier requesting that customers be provided the option of opting-out from receiving RBMs altogether.

On the matter of the inclusion of remaining usage in the RBMs, most responses agreed with the CRU's proposal of including a balance estimate in the RBM where less than 10 days estimated usage remains. However, respondents also sought clearer instruction on how the remaining estimated usage be calculated, particularly in situations where the customer is new to the supplier and therefore does not have past consumption data.

Regarding the CRU's proposal not to mandate any specific channel of communication for the sending of RBMs, all respondents agreed with a general view that it should the customer's choice to pick their preferred channel for the receipt of these messages. One respondent did however request that a default channel of communication be set for RBMs.

CRU Commentary

In relation to the CRU proposals on the timing of, and information included in, customer RBMs, and, the consultation responses received, the CRU's view is that the proposal be implemented as consulted.

In response to respondents' queries on how the customer's estimated remaining balance should be calculated, the CRU notes its electricity SPAYG decision (CRU21109) in which the CRU affirms that a supplier having access to the customer's past consumption data should be sufficient for the supplier to provide personalised balance estimates for that customer. In scenarios where the supplier does not have access to the customer's past consumption data (e.g. where a customer has only recently joined that supplier), the supplier should use the average daily consumption of a regular household. Suppliers may calculate this average daily consumption of a regular household using consumption data of their own customer base, or alternatively calculate it using the estimated annual bill consumption amount of 11,000kWh.

The CRU also agrees with the respondent that sought to ensure that any estimated remaining balance communicated to the customer is explicit in stating that it is an estimate, and that the customer's supply will not automatically disconnect on that date.

The CRU proposed that no particular channel of communication be mandated for the sending of RBMs, again aligning with the customer experience in electricity SPAYG, which was accepted by respondents. Customers will be best placed to decide which channel of communication suits them best to receive RBMs. The CRU will not mandate a specific time of the day for the sending of RBMs, as suppliers are best placed to decide when to send these communications at times most amenable to customers.

Finally, the CRU acknowledges the response seeking a more principle-based rather than prescriptive approach to sending RBMs, however these messages are very important in the context of gas PAYG customers avoiding frequent disconnections and must therefore be actioned in a uniform manner across suppliers. Similarly, the CRU does not agree with the respondent who requested that customers be granted an option to opt-out of receiving RBMs entirely. It is imperative that customers receive RBMs given customers risk disconnection following two midnight balances of zero. This is also why having the ability have a nominated representative to manage customer accounts and receive these messages is crucial.

CRU Decision

Therefore, the CRU has decided that:

- RBMs must be sent to customers at least weekly by default. Suppliers may choose to provide RBMs more frequently, and customers can opt in to receive these, if they so wish.
- All RBMs must include a remaining balance estimate (the estimated period of time in number of days that the balance is predicted to last) when the customer has less than 10 days remaining usage on their account;
- There will be no particular channel of communication mandated for the sending of RBMs. Suppliers must instead agree a preferred channel for the sending of RBM's with the customer at sign-up (e.g. app notification, email, SMS).
- Suppliers must offer each customer the option for a nominated representative to also receive these messages.

3.2.2 Disconnection Warning Messages

CRU Consultation

The CRU proposed that suppliers establish a reliable Urgent Alert Channel[9] to ensure customers receive disconnection warning messages. The CRU also proposed that:

1. At least two disconnection warning messages be sent to the customer by the supplier before disconnection
2. There must be a minimum 21-hour gap between the first disconnection warning message to the customer, and the disconnection request to GNI.
3. All disconnection warning messages must:
    i. Include the 'stay connected' top-up amount;
    ii. Be sent to the customer via SMS and be accompanied by an email/app notification;
    iii. Cannot be separately charged for by the supplier;
    iv. Suppliers must offer each customer the option for up to one additional household member (or person nominated by the customer) to receive the disconnection warning messages, and advise the customer how to update their settings (e.g. alert channel or contact details) including the consequences of not doing this;
    v. Include the time/date by which the 'stay connected' top up is needed to be made.

The CRU posed the following question on this topic:

1. Do you think the CRU's proposal on supplier disconnection warning messaging is appropriate?

Responses Received

The CRU's proposals were broadly agreed with by respondents. Two respondents requested that the channel of communication for the sending of disconnection warning messages not be mandated. Another respondent emphasised the importance of the 'stay connected' top-up/vend amount being accurate to ensure customers are not left without supply despite topping-up. Respondents were also largely in agreement that a nominated representative should also receive the disconnection warning messages along with the account holder.

CRU Commentary

[9] A dedicated channel for receiving disconnection warning messages, which may be the same channel used for other balance notifications.

The sending of disconnection warning messages by suppliers to customers is crucial to avoiding unnecessary disconnections. Customers must be given the information in a timely manner, thus allowing them to top-up/vend and avoid disconnection. The receipt of the disconnection warning message via SMS is the most direct way in which to provide this information to customers. However, an additional notification channel must accompany the SMS and it is prudent that customers receive the same disconnection warning message either via email or an app notification on a mobile device to ensure customers remain informed. Customers choice regarding this preferred communication channel must be provided for.

The CRU welcomes the response highlighting the importance of the 'stay connected' top-up/vend amount. This 'stay connected' amount must be calculated taking into account any deductions due from the customer's next top-up/vend as a result of any outstanding legacy debt, standing charges debt or emergency credit debt to ensure the top up amount is sufficient to maintain the customer's connection.

Finally, the inclusion of a nominated representative to receive the disconnection warning messages (as well as the account holder) is crucial as it reduces the chance of disconnection warning messages being missed, leading to disconnection of the customer.

CRU Decision

The CRU has decided that:

- At least two disconnection warning messages be sent to the customer by the supplier before disconnection (a day apart as these are based on midnight balance reads from GNI)
- There must be a minimum 21-hour gap between the first disconnection warning message to the customer, and the disconnection request to GNI.
- The disconnection warning message must:
    a. Include the 'stay connected' top-up/vend amount;
    b. Be sent to the customer via SMS;
    c. Be accompanied by an email or app notification depending on the customers preference;
    d. Cannot be separately charged for by the supplier;
    e. Include the time/date by which the 'stay connected' top up is needed to be made.

- Suppliers must offer each customer the option for a nominated representative to receive the disconnection warning messages;

3.2.3 Required time for customers to receive balance updates

CRU Consultation

In its consultation, the CRU highlighted the importance of customers receiving up to date balance information, which is fundamental in informing customers of when they should top-up/vend to avoid disconnection. The CRU proposed that, should meters 'wake-up' once daily between 00:00 and 05:00, the 'backstop' time for the customer to view their updated balance (in €) should be 12:00 noon.

The CRU also proposed that when a customer tops-up, confirmation of their top-up/vend, as well as their updated credit balance, be communicated to them by their supplier via a push notification[10] (SMS or email) as soon as possible afterwards.

Therefore, the CRU posed the following questions:

1. Do you agree that an appropriate back stop (time period) for customers to receive their updated balance, is within 12 hours following the meter waking up?
2. Do you agree with the CRU's proposals for customer receipt of top-up confirmation and updated balance following a vend, (either in the event of a Thin or Hybrid meter solution)?

Responses Received

Respondents unanimously agreed with the CRU's proposed backstop time of 12 hours for a customer to receive their updated balance following the commencement of meter wake-up at midnight (00:00). This means, customers would receive their updated balance (in €) by 12:00 noon each day.

Respondents were supportive of the CRU's proposal that customer's receive confirmation of their top ups/vends, and, an updated account balance, as soon as possible following a vend. However, some respondents also expressed the view that it is unrealistic for the customer to

[10] A push message is sent to the customer, for example through an SMS or email. A pull message requires the customer to actively log on to an online system to access relevant information. The information made available to the customer through a pull message should be updated weekly as default, or more frequently (up to daily) if that is the customer preference.

receive an updated account balance (€) immediately after the top up/vend, as the customer's account balance (including usage) would not update until the next meter wake-up (between 00:00 and 05:00 the following morning).

CRU Commentary

Customers having visibility of their credit balance is important in allowing them to manage their gas usage and in deciding when to top-up/vend, and by how much. The CRU welcomes that respondents unanimously agree that customers should have access to this balance by 12:00 noon daily (following the meter wake-up commencing at 00:00 midnight – see section 3.1 for more information on meter wake-ups).

The CRU believes it important that customers are given reassurance that, following a top-up/vend (particularly in-store), the credit they have purchased is now available for them to use (less any deductions for outstanding arrears or emergency credit etc). As set out in section 3.1, suppliers are mandated to ensure they receive confirmation of a customer's top up from any third-party vending provider within 30 minutes of a customer topping-up. Following this, suppliers will send a push notification (email or SMS as agreed with the customer at sign-up) to inform customers that their top up/vend has been received by the supplier and is available for them for the customer for gas usage.

The confirmation messages to customers should note that if a customer is disconnected and has topped-up to be reconnected, it may take longer for the top-up/vend to be available for gas usage due to the reconnection processes which must occur and can only occur with the customer being physically present at the premises. Customers that have been disconnected and topped-up for reconnection should also receive a message that informs them when the gas is available on their meter, at which point they can press a button on their meter which allows the valve to re-open and gas to start flowing again. This message should reiterate to the customer that all gas appliances in the premises must be turned off, when the button is pressed, for safety reasons.

In relation to the issue of providing updated account balance (€) information to customers following top up vends, some respondents pointed out that providing this updated account balance (€) to the customer as part of any top-up/vend confirmation message would be inaccurate given that the customer's account balance (€) would only update accurately once the meter wakes up between midnight and 5am. The CRU therefore does not believe that it would be appropriate to mandate suppliers to provide an updated account balance (€) as part of the top-up/vend confirmation message sent to a customer. Instead, the customer will receive confirmation that their top-up/vend has been received by the supplier and is available for use.

CRU Decision

The CRU has therefore decided that:

- Suppliers must provide customers with their updated balance (in €) by 12:00 noon each day;
- Customers must receive confirmation by push message (via the customer's preferred channel) as soon as possible following their top up vend. This communication should inform the customer how much of their vend is available for gas usage (less any deductions for legacy debt, standing charges or emergency credit debt), and that if the customers has topped-up to be reconnected that the reconnection process may take longer (see section 3.1 above);
- Customers do not need to be informed of their updated account balance (€) in the top-up/vend confirmation message to be sent to them.

3.3 Solutions for those who may have trouble viewing balances

CRU Consultation

As the new meters will not have the functionality to view balances on the meter itself (with balances instead visible either by web facility or mobile application), alternative solutions are being sought by CRU for customers who are unable to view their balance via web facility or mobile application.

In its consultation the CRU proposed the following options as potential solutions:

- Option 1: A supplier provided phone service whereby customers could text a code provided to them by their supplier, or ring an automated phone line, and receive their latest balance. The customer's latest balance would be based on the latest meter 'wake-up' (which would have occurred between 00:00 and 05:00 earlier that day – see section 3.1) i.e. the balance would not be their real-time balance.;
- Option 2: The customer may have a 'nominated representative' to manage their supplier provided web facility (and/or app). This is already provided for in the CRU's Electricity and Gas Suppliers' Handbook;
- Option 3: The possibility for GNI or suppliers to provide in-home display devices to customers on request. This device could be situated somewhere the customer could easily view within their house and could display an updated balance of gas usage that it would receive from communicating with the meter. Again, it must be noted that the balance appearing on the meter would not be a real-time balance as it would only update following a meter 'wake-up'.

The consultation sought feedback on the proposed options:

1. What are your thoughts on the suitability of the above options to support customers who may struggle to read their balance on the new meter system?

Responses Received

The majority of respondents' preferred approach was option two, which enables customers to nominate a representative to receive and manage balance information on their behalf. Respondents stated this provides an established effective means for supporting customers who may struggle to read their balance on the new meter system.

One respondent also stated while the ability to have a nominated representative should be available, it shouldn't be the default option for these customers.

The majority of respondents opposed option three of GNI or suppliers providing in-home display (IHD) devices to customers on request. Most cited that in a recent CRU decision on Smart Meters where the CRU decided against requiring electricity suppliers to provide IHDs, instead favouring a market-led approach.[11] One respondent noted that the meter designs being considered via the procurement process do not facilitate local communication between the gas meter and any device in the customer's home. The respondent also noted that if GNI were to provide the in-home device they do not have access to tariff information needed to provide a monetary balance to customers on the device.

Another respondent however was in favour of this option and wished for the supplier to provide the device.

Some respondents were also supportive of the automated phone service (option one) with one respondent recommending that this phone system included an option for customers who wish to speak directly with their supplier. Another respondent stated the automated phone system may be difficult to use for customers who have trouble viewing their balance online, and noted the system would require supplier provided IT developments.

CRU Commentary

There was broad support for option 2 as consulted upon i.e. customers nominating a representative to manage their supplier provided web facility to monitor their balance. The CRU views this as an effective and established means for customers to view their balance

In relation to option 3 however, the provision of IHDs would be inconsistent with its recent Smart metering decision (CRU2025191) where the requirement for ESBN to provide IHDs is not required, with CRU deciding a market□led approach instead. The CRU also acknowledges the IHD is unlikely to offer substantial benefit to gas PAYG customers, as it would not display a monetary balance in any case.

With regard to option 3, the CRU acknowledges concerns regarding the usability of the automated phone service solution for customers who may have difficulty with technology and the need for IT system enhancements by suppliers. Notwithstanding these concerns, the CRU considers it essential that customers who are unable to access their balance through a web

[11] Smart Meters - Access to Near Real Time Metering Data Decision Paper

facility, have an alternative way of doing so. While recognising that some customers who may have difficulty with technology may also face challenges using an automated phone service, the CRU expects the number of customers unable to access this service is likely to be limited. The CRU notes one respondent's recommendation that any phone system have clear pathways for customers who wish to speak with their supplier. The CRU agrees that suppliers continue to provide telephone support to customers including an option for customer's calls to be directed to agents with whom customers can speak to regarding their PAYG account.

Overall, the CRU believes that the automated phone service, with the option for customers to speak with their supplier, combined with the ability to have a nominated representative, is consistent with current practice and provides a balanced approach that will provide support for customers.

CRU Decision

Therefore, the CRU has decided that:

- Suppliers must provide customers with the ability to nominate a representative to manage their supplier provided web facility (and/or app) and monitor their balance, as is the case for electricity SPAYG customers (set out in section 9.3.4 of the Handbook).
- Suppliers must provide an automated phone service whereby customers can call or text the supplier and receive an automated balance update, making it clear on the balance update call or text that this is not a real-time balance and is the balance at last meter 'wake-up'.
- Suppliers must provide an automated phone line which must include an option in which a customer's call can be redirected to an agent with whom customers can speak with regarding their gas PAYG account.

3.4 Balance transfer (during meter deployment)

CRU Consultation

Currently, when gas PAYG meters are replaced (by another gas PAYG meter), the GNI installer is responsible for recording and transferring the meter's credit and debt balances to the supplier, following existing procedures used during meter replacements. However, there can be issues whereby the gas fitter cannot immediately transfer the outstanding credit or debit balance onto the replacement meter.

In the consultation paper, the CRU proposed a three to five days period after the installation of the new meter where suppliers are not permitted to disconnect gas supply to the customer for not topping up. It was noted that, given the increased complexities of exchanging a current meter for the new replacement gas PAYG meter, difficulties in transferring the customer's existing balance may arise. There could also be other issues for a small number of customers such as initial meter communication issues with GNI and customers needing time to understand the new meter. This three to five days period would give time to resolve such issues, and provide customers time to communicate any issues to their supplier/GNI and avoid the risk of being disconnected due to not topping up.

As such, the CRU posed the following question:

1. Do you think the proposed approach of not allowing suppliers to disconnect customers for non-payment in the first three to five days after installation of a new meter is appropriate?

Responses Received

All respondents agreed with the approach of not allowing suppliers to disconnect customers for non-payment in the first three to five days after installation of a new meter. Respondents cited this allowed time for the new service to be set-up and for any issues to be identified. Some respondents noted that the customer conversion to the new gas PAYG System should be completed as quickly as possible to allow the full PAYG service to be made available to customers as quickly and cleanly as possible. One respondent stated any accrual of debt must be clearly communicated to customers during this window, to avoid problems at the end of this three to five days window.

One respondent stated the period during which suppliers are not permitted to disconnect a customer should be no longer than five days to avoid the risk of customers moving straight into an arrears position. One respondent suggested this period should be set at five days with the supplier having discretion to extend it. Another respondent suggested that if technical issues are raised with the supplier and the supplier is unable to resolve them in this window, there should be flexibility for this period to be extended. One respondent sought clarity on whether the period is to be three to five business days or three to five calendar days.

Lastly, one respondent suggested this requirement should not apply to new customers switching to a PAYG service that do not have a balance from an on an old meter.

CRU Commentary

There was broad agreement of the proposal of not allowing suppliers to disconnect customers (disconnection requests can only be sent by suppliers) for non-payment in the first three to five days after installation of a new meter.

The CRU agrees with respondents that this allows time for the new service be set-up and for any issues to be identified without the threat of disconnection for the customer. The CRU supports setting this period at five days (from when the supplier will have received the market message confirming their customer has had their replacement meter installed), as it should provide sufficient time to resolve any issues while limiting the risk of customers accruing excessive debt. In any case, the potential accrual of debt in this period should be communicated to customers to avoid balance shock and customers entering arrears.

Suppliers' initial communications with customers about the meter should provide details of this period of non-disconnection, along with the potential accrual of debt that could occur during this period. The exact communication of this message should be finalised in the GPAYG Customer Care and Communications working group.

The CRU acknowledges one respondent's suggestion that this period should be no longer than five days to avoid entering a non-payment position from installation of the meter. Other respondents stated there could be circumstances where it is appropriate for this period to be extended. The CRU is of the view that where technical issues remain unresolved, customers must not be disconnected provided the customer has notified the supplier and/or GNI of the issue. Where a customer has reported an issue, it would be unfair to disconnect them while the fault remains.

One respondent queried whether the period was intended to be three to five calendar days or three to five business days. As customers cannot be disconnected on weekends or public holidays (in accordance with Friendly Credit periods), the period for non-disconnection after meter installation will be five business days. It is also worth noting that both GNI and suppliers will be more readily available on business days to address any issues that may arise.

Finally, one respondent believed this period should not apply to new customers switching to PAYG as they do not have a balance available on an old meter that needs to be transferred. However, as discussed in the consultation, there may be initial issues such as the meter having trouble communicating with GNI and customers needing time to understand the new meter which would apply to new customers as well as existing customers.

CRU Decision

The CRU has decided suppliers will not be permitted to disconnect customers for non-payment in the first five business days after installation of a new meter. This protection must be extended where the customer has notified their supplier of any technical issues, and it must remain in place until those issues have been fully resolved.

3.5 Mandatory Vending Channels

CRU Consultation

The new meter system will necessitate suppliers having, at minimum, an online web top-up/vending facility. Suppliers may also opt to offer a mobile top-up/vending facility (via an app) and/or to provide a phone call top-up/vending facility. Suppliers are also required to maintain in-store top-up/vending facilities.

As such, the question posed by CRU on this issue was:

1. Do you agree with the CRU proposal that a web top-up facility should be mandatory along with the existing in-store top-up facility, with optional mobile top-up (via an app) and optional phone call top-up facilities?

Responses Received

The majority of respondents agreed with CRU's approach that a web top-up/vending facility should be mandatory along with the existing in-store top-up/vending facility, with optional mobile top-up/vending (via an app) and optional phone call top-up/vending facilities. Respondents highlighted that this approach gives customers a convenient and accessible system to buy credit, while also giving suppliers sufficient flexibility to develop their own top-up/vend solutions.

Two respondents stated that suppliers should have discretion in relation to mandatory payment channels provided to customers. One respondent stated suppliers should be able to choose what online facility they wish to provide, i.e. either app, web or both. Another respondent stated suppliers are best placed to respond to customer needs and a prescriptive approach impedes that ability. The respondent stated that, should the CRU decide to mandate any specific payment channels, the requirement should be regularly reviewed.

One respondent stated that web top-up/vending, in-store top-up/vending, and phone call top-up/vending facilities should all be mandatory to allow flexibility for those with low digital literacy.

CRU Commentary

The CRU notes that the majority of respondents agree with the proposal to mandate a web-top up/vend facility with optional mobile top-up/vend (via an app) and optional phone call top-up/vend facility. The CRU further notes the view that suppliers should have discretion to choose between either an app, web or both and that a less prescriptive approach would allow suppliers to respond to customers' needs better.

The CRU considers its proposed approach most appropriate, as it provides suppliers with the flexibility to design solutions they believe best support their customers, while still ensuring that all customers receive a minimum level of service that does not put in place technological barriers preventing customers from topping-up. The CRU also considers a web-based service to be inherently more technologically accessible than an app, as it does not require a smartphone, specific operating system, or regular software updates.

The CRU also acknowledges the suggestion that phone call top-up/vend facilities should be mandatory to allow flexibility for those with low digital literacy. Although the CRU encourages suppliers to develop solutions that meets the needs of all their customers, the CRU also recognises that those with low digital literacy can avail of in-store top ups, and/or can nominate a representative to manage their account. Requiring a mandatory phone call top-up/vend facility would increase costs, which would ultimately be passed onto customers.

CRU Decision

The CRU has decided that suppliers must provide a web top-up/vend facility and maintain in-store top-up/vend facilities. Mobile top-up/vending (via an app) and phone call top-up/vend facilities are optional for suppliers to provide.

3.6 Estimated Meter Reads

Gas PAYG meters are designed to provide accurate and timely meter data through secure cellular communications. However, as highlighted in the CRU consultation, there may be rare situations, such as temporary communications interruptions, where estimated reads may be provided by GNI and to suppliers. In these situations, suppliers may then use these estimated meter reads to update customers' account balances.

The CRU sought feedback from respondents on what should occur when estimated reads are used by suppliers to update a customer's balance, as well as whether customers could be self-disconnected based on estimated meter reads.

3.6.1 Updating Customer Balances

CRU Consultation

In instances where actual meter reads cannot be taken, the consultation provided the following options:

- Option 1: Supplier to provide (on the mandated web facility) a monetary balance update to the customer based on the estimated meter read provided by GNI, and the supplier corrects the monetary balance once more accurate data is provided by GNI;
- Option 2: No estimation is calculated. Suppliers share an updated balance with the customer on the assumption that no gas was consumed (for the day of the estimation). When an actual read becomes available from GNI, the monetary balance will be updated.
- Option 3: GNI provide the estimated meter read to suppliers, who may then provide an updated monetary balance to the customer (on the mandated web facility) based on the estimated read from GNI or provide the customer with an updated monetary balance on the assumption that no gas was consumed (for the day the estimate relates to).

On this topic, the CRU asked:

1. Which of the options stated above do you believe is the most appropriate for updating customers on their balances in situations where only an estimated read is available?

Responses Received

The majority of respondents favoured option 1, where suppliers provide a monetary balance update to the customer based on the estimated meter read provided from GNI, and correct it once more accurate data is provided.

Respondents cited this supports continuity of service by giving customers an indication of when to top-up/vend and avoids sudden balance shocks when actual reads become available.

Two respondents stated supplying estimated balance updates to customers where needed should be standardised (i.e. not be at the discretion of the supplier whether estimate is supplier-provided or network-provided), to avoid different experiences for customers across suppliers which may lead to confusion. One respondent stated that enabling half-hourly reads would allow for more accurate estimate balances to be provided.

One respondent preferred option 3, giving suppliers the discretion to supply an estimated balance update or not.

One respondent stated that customers should be shown both the estimated balance and the balance from the last meter wake-up. They suggested that messaging should also include the

time elapsed since the last meter wake-up and that if a customer's balance is updated with an estimate and is later updated with a corrected balance, it should be clearly stated.

One respondent asked in what situations do the CRU envisage estimated reads occurring, given the meter will only be used in locations where there is a high Comms Technically Feasible (CTF) score.

CRU Commentary

Based on the feedback received, the CRU favours option 1 whereby the supplier would provide an estimated monetary balance to customers, based on an estimated meter read from GNI.

This will help to avoid balance shocks and provide customers with key indication of when they should top-up/vend. Standardisation of balance estimates is important to ensure customers have the same experience across suppliers. The CRU notes one respondent suggesting that half-hourly data would support the provision of balance estimates – the matter of half hourly data is discussed in section 3.8 however the CRU views daily reads as sufficient to provide customers an indication of their balance.

With regard to one respondent's suggestion that both the estimated balance and balance at last meter wake-up should be communicated to the customer, the CRU considers clear customer communication as essential. Presenting multiple balances may confuse customers and may be difficult for suppliers to communicate. The CRU therefore considers it more appropriate that, where there is a balance estimate, it should be clearly communicated as such and when corrected this should be communicated separately by the supplier.

Furthermore, where a customer's updated daily balance includes an estimate, this should be clearly shown, and likewise where a customer's RBM includes an estimate this should also be clearly shown. When a meter read is corrected, this should be communicated clearly (within the balance update notification) to the customer via their preferred communication channel (the communication channel as agreed with the customer at sign-up).

In relation to one response that queried scenarios where estimated reads would be required (given the high CTF score of locations in which the replacement meters will be installed), the CRU notes that there is inevitably situations where there is a need for estimated reads e.g. where the communications network fails and/or due to weather events.

CRU Decision

Therefore, the CRU has decided that:

- Suppliers must provide (on the mandated web facility) a monetary balance update to the customer, based on the estimated meter read provided by GNI, and correct it once more accurate data is provided;
- Suppliers must communicate with a customer clearly (within the balance update notification) where a balance is an estimate. Suppliers must also communicate clearly where a balance estimate is corrected with an actual value.

3.6.2 Self Disconnections based on estimated meter values

An estimated meter read will be calculated by GNI in instances where the meter has been unable to transmit the actual metered consumption captured for a certain period (normally a day). This may occur due to connectivity issues and usually only happens sporadically.

In its consultation, the CRU recommended that when an estimated meter read is calculated, that disconnections are not allowed on the basis of those estimates, and instead any potential disconnections are delayed until actual meter readings are available.

Therefore, the question posed on this topic was:

1. Do you agree with the CRU's proposal that disconnections should not be permitted on the basis of estimated meter reads?

Responses Received

The majority of respondents agreed with the CRU's proposal that disconnections should not be permitted on the basis of estimated meter reads. Respondents noted that estimates may not reflect actual usage and could therefore lead to unfair disconnections. One respondent also stated households self-ration in response to having low credit so estimated balances may be inaccurate.

One respondent favoured disconnections being permitted on the basis of estimated meter reads, stating suppliers will still have insights into factors such as customer's top up activity and standing charges. The respondent argued suppliers should be afforded the ability to take these factors into account and choose whether to issue a disconnection request to GNI or not.

One respondent stated that the approach to disconnection for GPAYG should take into consideration overall communications performance. The respondent noted that in electricity SPAYG, CTF levels are monitored on a rolling basis to identify meters with persistent communications issues and this should be the approach in GPAYG. They argued if a customer

has multiple days of low CTF scores leading to no actual meter reads, the customer should have a solution other than the GPAYG meter.

CRU Commentary

The CRU agrees with the majority of respondents that disconnections should not be permitted on the basis of estimated reads.

In relation to the response which suggested that disconnections should be permitted based on estimates given suppliers' insights on customer's top up activity, the CRU recognises that whilst suppliers have visibility of certain customer behaviours, there is no guarantee of a customer's usage and as such, the CRU considers it unfair to disconnect a customer without confirmation of their true balance.

In relation to the monitoring of CTF levels, GNI has confirmed that these will be monitored on a rolling basis to identify meters with persistent communications issues. GNI will also develop a clear escalation path for customers whose meter requires frequent balance estimates (an indication that there are ongoing CTF issues). The CRU also agrees that if a customer is persistently having low CTF scores leading to no actual meter reads, the customer should have other options beyond GPAYG (such as moving to a billpay solution).

CRU Decision

The CRU has decided that disconnections will not be permitted on the basis of estimated reads.

3.7 Customer Reverting to Billpay

CRU Consultation

When a customer who has had a new gas PAYG meter installed wishes to revert to bill-pay, there are various options available to GNI concerning the meter. The central decision is whether to retain the new-generation PAYG meter in situ and switch its functionality for bill-pay use, or to replace it with a traditional credit meter.

Both options are summarised below:

Option 1: Exchange the New GPAYG Meter for Traditional Credit Meter

This is the current practice whereby GNI provides either a PAYG meter or a credit meter to customers, and GNI exchanges these as requested (i.e. PAYG to credit, or credit to PAYG).

Depending on the meter procured by GNI, it is yet to be known if the replacement meter is removed whether it would be re-usable at another premises.

Option 2 - Retain the New GPAYG Meter and Operate it in Billpay Mode

Where a customer decides to move from GPAYG to credit, the new GPAYG meter could be left in situ, with remote reading functionality disabled, thus the meter functioning the same as all other credit meters. In such circumstances, the meters would be manually read and manually locked or unlocked where appropriate (the same as other GNI credit meters). The communications capability remains available for switching the meter back to PAYG mode should the customer (or a future customer) wish to revert to PAYG. GNI estimate this option would save between €1.1 million and €2.1 million over a 5-year period arising from avoiding the costs of exchanging meters.

The CRU expressed support for this second option in the consultation paper, given both the cost savings and the flexibility for customers it provides.

As such, the CRU posed the following question in its consultation:

1. Do you agree with the CRU's proposal that the new meter remain in situ should a customer revert to billpay?

Responses Received

The vast majority of respondents agreed that the new meter should remain in situ should a customer revert to credit/billpay. Respondents agreed that this avoids unnecessary siteworks costs while allowing an easy transition back to PAYG if the customer (or a future customer) wished to revert.

One respondent favoured switching the new PAYG meter for a traditional credit meter, stating that introducing credit functionality to the new meter could lead, for the new gas PAYG project, to scope-creep, project delays, additional costs and supplier burden. The respondent stated this functionality should be revisited once PAYG deployment stabilises.

One respondent argued that, if the meter remains in situ after a customer has switched to billpay, remote read functionality should not be available. They contended that the priority at this moment should be delivering the replacement PAYG meters, and that enabling remote reads would create a different customer experience between current billpay customers and customers who have a new PAYG meter in billpay/credit mode.

Two further respondents stated also that any enabling remote read functionality for billpay customers (who have switched from PAYG) should be considered out of scope for this project, and its introduction should be subject to future consultation.

One respondent argued remote functionality should remain in place for customers switching to bill pay to make accurate billing easier for suppliers.

One respondent also stated there should be no siteworks fee levied on customers for switching to a PAYG service.

CRU Commentary

The CRU notes agreement with its as consulted upon position, by the majority of respondents, that the meter should remain in situ in situations where a customer has switched from gas PAYG to credit mode. GNI estimated this would provide a saving on siteworks costs of between €1.1 million and €2.1 million over a 5-year period. It will also allow customers who switch to billpay mode, to easily switch back to PAYG if they so wish without the need for a new meter.

In relation to the suggestion of having remote meter reading functionality enabled while the meter is in credit mode, the CRU is cognisant that enabling remote meter reading functionality would create a different experience for billpay customers between those with a traditional credit meter and those with a newer GPAYG meter (operating in credit mode). Introducing this functionality now would require additional work for GNI and suppliers at this stage of the project. However, the CRU may revisit this matter in the future.

In relation to a respondent's suggestion that there should be no siteworks fee levied on customers for switching to a PAYG service; the CRU does not believe there is a justification to waive such fees for customers who choose ('lifestyle choice') a PAYG meter which is a cost socialised across other gas customers, unlike financial hardship customers who receive their PAYG meter free of charge due to the situation they find themselves in.

CRU Decision

The CRU has decided that:

- The new GPAYG meters installed will remain in situ should a customer revert to billpay;
- The new GPAYG meters will not have remote read functionality if/when in credit mode.

3.8 Granularity of Meter Read Data

CRU Consultation

The new gas meter may be capable of collecting balance data at two levels of granularity. One option is to collect one 24-hour read. This is the minimum requirement to ensure that a viable PAYG service can be provided to the customer i.e. this allows for the customer balance to be recalculated once per day. However, the meter may also be capable to collecting 48 half-hourly reads in a day.

In the consultation, the CRU proposed that one 24-hour read be taken per day stating that half-hourly data is not necessary for the new gas PAYG system to function efficiently and is not needed to provide customers with an online top up facility, nor to provide customers the ability to view their account/data at any time. Under current data protection law, granular data processing must be justified and limited to what is essential. GNI has confirmed it will not use, nor does it need, half-hourly data to operate the new GPAYG system. Offering half-hourly reads to gas PAYG customers would create an imbalance in the service (information) received by some customers compared to bill-pay customers.

Therefore, the question posed on this topic was:

1. Do you agree with the CRU's proposal that a single 24-hour meter read be collected?

Responses Received

Responses were varied with some respondents favouring a single 24-hour meter read and others supporting the collection of half-hourly data.

One respondent who favoured a single 24-hour meter read being collected argued that gathering more detailed data was unnecessary and that they could not identify a suitable legal basis under data-protection law for collecting it. Another respondent noted that, unlike electricity, gas does not operate in a time-of-use environment so a single 24-hour read ensures PAYG services provides necessary data updates to customers without introducing additional system complexity. Another respondent agreed that the collection of a single 24-hour read is sufficient but stated should be revisited when the full details of the meters and data options are available.

Some respondents argued that the collection of half-hourly data has several benefits for customers citing customers will be able to effectively monitor their consumption and track and save on their usage, will be able to identify what appliances are consuming the most gas, and that customers are more responsive to additional usage information. One respondent stated that

half-hourly data would allow suppliers to time disconnections at suitable times based on customer's consumption patterns and that knowing the specific times in a day that the customer most uses the gas supply means that suppliers can increase their communications with customers to advise of disconnection risks. The respondent also argued that more granular data encourages competition among suppliers.

CRU Commentary

The CRU notes responses to the CRU proposal were varied. It is important, when considering this proposal, to note the minimum requirements the CRU set out to GNI at the outset of the project.. These minimum requirements instead set out the necessary functionality of the replacement GPAYG meters in areas such as vending capabilities (i.e. where and how customers could top-up/vend), options for checking account balance (via online facility), and ease of meter procurement (should another meter provider be needed, as an emergency, in the future).

The CRU accepts that although there may be some benefits to collecting half-hourly data as per the responses received, there are several issues with introducing additional complexity at this stage of the project.

To comply with data protection law, the processing of granular consumption data requires justification by each entity (GNI/suppliers) as only the minimum data necessary for the purpose of the operation of the system would likely comply. Supplying half-hourly data to some customers would also create an imbalance in service between GPAYG and bill-pay customers, and bill-pay customers with a new GPAYG meter in credit mode.

The CRU also notes that gas tariffs are not designed in a way that the price differs throughout the day like in electricity, as gas does not have to be consumed at its moment of generation. In jurisdictions such as the UK, where half-hourly data is available to gas suppliers, it appears it is often underutilised in both the provision of data to the customer and design of tariffs for this reason.

Therefore, the CRU is supportive of only collecting a single 24-hour meter read at this time but may revisit this matter in the future.

CRU Decision

The CRU has decided that the meter will collect a single 24-hour meter read each day.

3.9 Emergency Credit & Debt Recovery Hierarchy

It is expected that the new meters may be able to offer suppliers greater flexibility to on emergency credit thresholds and limits (currently €5 remaining credit and €20 limit respectively) to be offered to customers, and, the opportunity to tailor their debt recovery approach to individual customers, or entire customer cohorts.

Emergency Credit

Currently, customers can avail of emergency credit when their credit runs out. Once their meter balance has fallen below a certain threshold of credit (currently €5), suppliers contact their customers and offer them emergency credit (minimum €20) to avoid disconnection. Emergency credit available to customers is minimum €20 as mandated by the CRU.[12]

In the consultation, the CRU sought feedback from respondents on whether both the low credit threshold (€5 remaining credit) and minimum emergency credit (€20) should be set locally by suppliers on the new meters. This would mean the low credit threshold and emergency credit minimum could vary at the discretion of the suppliers within CRU mandated values.

Debt Recovery

The current recovery of debt on the meters is set centrally by GNI and mandated by CRU as:

- legacy debt recovered at maximum of 15%of a customer vend/top-up, and;
- emergency credit and standing charges recovered at a maximum of 35% of a customer top-up/vend).

The consultation sought feedback from respondents on altering the debt recovery rates on the new PAYG meters for individual or cohorts of customers, within CRU set parameters.

On this matter, The CRU consultation posed the following questions:

1. Do you think that granting suppliers the ability to alter the emergency credit threshold and emergency credit limit would be beneficial to customers who find themselves using emergency credit?
2. What are your thoughts on the potential introduction of maximum and minimum debt recovery ratios for gas PAYG customers?

[12] In accordance with the Electricity & Gas Suppliers' Handbook, and, CRU's Additional Customer Protection Measures for Household Electricity and Gas Customers 2025/26

3. Do you think the collection of emergency credit debt, legacy debt, and standing charges debt should be treated differently and thus be subjected to different recovery ratios?

Responses Received

Emergency Credit

In relation to the low credit threshold of €5 and emergency credit minimum of €20, all respondents were supportive of suppliers having the ability to alter these within the CRU mandated values. Respondents noted that providing this facility would give more flexibility to suppliers in tailoring support to individual customer circumstances. One respondent also noted this proposal would be useful during exceptional circumstances such as weather events or system outages where temporary increases to the emergency credit could prevent avoidable loss of supply.

One respondent was in favour of this measure but noted any change to a customer's emergency credit threshold and emergency credit limit should only follow communication between the supplier and the customer.

Debt Recovery

In relation to the debt recovery rates (the maximum 15% legacy debt and maximum 35% standing charges/emergency credit) for gas PAYG customers, all respondents again agreed with the introduction of supplier flexibility within maximum CRU mandated values.

Two respondents also suggested that individual payment arrangements should be facilitated if customers wish to pay more than the maximum debt recovery rate mandated by CRU. Two respondents agreed with the CRU proposal but suggested that further consultation on the minimum and maximum debt recovery rates is required.

One respondent requested that CRU and GNI provide clarity on how debt recovery for dual-fuel PAYG products will operate if a minimum and maximum recovery rate was introduced.

The majority of respondents were against the concept of legacy debt/emergency credit/standing charges being recovered with different weightings (percentages) than they are currently, citing that the current system (whereby emergency credit and standing charges debt is recovered as a greater proportion of a customer's top-up/vend than legacy debt) is appropriate and any changes may add complexity to collection of debt for suppliers and confusion for customers who are familiar with the current system.

However, some respondents suggested that suppliers should be provided with the flexibility to alter the recovery ratios, and in some cases, base them on individual customer situations.

A further respondent noted that each of these debts serve a different function so different recovery ratios for each may be appropriate in principle. This respondent also expressed a preference for emergency credit to be aligned to the approach in electricity smart PAYG where emergency credit is repaid in full before accessing it again or paying off other debt on the meter.

Another respondent stated that, should debts be treated differently, standing charges should be prioritised for collection as it will accrue during times of lower consumption (typically summer months).

Lastly, one respondent noted suppliers would need to be given sufficient time to test the new debt recovery hierarchy system, should it be brought in.

CRU Commentary

Emergency Credit

On the matter of providing suppliers flexibility to offer customers varying low credit threshold (currently €5 remaining credit) and emergency credits (currently minimum €20), the CRU notes all respondents are in favour of this flexibility. The CRU considers the flexibility beneficial, as it enables suppliers to tailor these values to individual customer circumstances. The CRU also agrees with the respondent who pointed out this ability would be useful during weather events or system outages where temporary increases to the emergency credit could prevent avoidable loss of supply. The CRU also agrees that any change in low credit threshold or emergency credit must be based upon an assessment of customer individual circumstances and communicated clearly to them.

Debt Recovery

On the matter of providing supplier flexibility on the altering debt recovery rates on the new GPAYG meters within CRU mandated maximum values, the CRU views this similarly to the adjustment of emergency credit parameters, in that it provides suppliers with the ability to tailor recovery levels to individual customer circumstances. Any changes to the debt-recovery ratio must be based however on engagement with the customer and an assessment of their individual circumstances and clearly communicated to the customer.

The CRU also acknowledges respondents suggesting that individual payment arrangements should be facilitated if customers wish to pay more than the maximum debt recovery allowed. However, the CRU's view is that a mandated maximum debt recovery rate remain appropriate (for clarity, these are currently maximum 15% of a customer top-up/vend for legacy debt, and recovery of standing charges debt and emergency credit is recovered in addition to this, to a maximum of 35% of a customer top-up/vend – meaning all three types of debt may be recovered

to a maximum of 50% of a customer's top-up/vend, should the customer be in arrears for each). The CRU is of the view this maximum debt recovery level strikes a balance between facilitating debt repayment and protecting customers from self-disconnection. For customers on dual-fuel products, the gas and electricity systems are separate and differ, and recover debt separately.

The CRU further notes that the majority of respondents expressed the view that the current recovery rate of legacy debt, standing charge debt and emergency credit remains appropriate. Altering these recovery ratios (where, for example, emergency credit could be recovered entirely before standing charges debt or legacy debt) would add unnecessary complexity of debt collection for both suppliers and customers.

The CRU also acknowledges the suggestion by one respondent that emergency credit repayment should be aligned to electricity smart PAYG, where emergency credit is repaid in full before accessing it again or paying off other debt on the meter. However, The CRU notes that gas and electricity serve different customer needs. Altering emergency credit in this way would create a risk of customers being without heat for longer periods and the associated health risks that may come with that.

Finally, in response to the feedback which sought further consultation on the setting of the minimum and maximum debt recovery ratios, as mentioned above, the CRU does not intend to change the maximum legacy debt recovery rate of 15%,[13] or the recovery of standing charges and emergency credit debt from their current ratio of maximum 35% of a customer's top-up/vend. These recovery ratios are set with greater weighting towards paying-off emergency credit and standing charges debt first, as standing charges debt can build-up over summer months when customers are topping up their GPAYG meters less frequently.

CRU Decision

The CRU has decided that:

- Suppliers will have the ability to increase both the low credit threshold and minimum emergency credit, mandated by CRU as €5 remaining credit, and €20 respectively. For the avoidance of doubt, the low credit threshold is currently €5 of remaining credit (at which time customers must receive a notification offering them access to the emergency credit), and €20 minimum emergency credit for customers. Suppliers can choose to offer customers access to emergency credit at a credit level higher than €5 and can choose to

[13] In accordance with the Gas & Electricity Suppliers Handbook 20% however currently, under CRU's Additional Customer Protection Measures 2025/2026 is capped at 15%.

offer customers emergency credit higher than the minimum €20 required by CRU. Any changes to these values must be clearly communicated to customers in advance.

- Suppliers will have the ability to reduce the debt recovery ratio for gas PAYG customers below the maximum limit which the CRU mandates. For the avoidance of doubt, the maximum level of legacy debt recovery on gas PAYG is 15%[14] of a customer top-up/vend, and the maximum level of standing charges and emergency credit combined is 35% of a customer top-up/vend. Any changes to these values must be clearly communicated to customers in advance;
- The recouping by suppliers of legacy debt (currently at maximum of 15% of a customer's top-up/vend), and standing charges and emergency credit debt (currently a combined to maximum 35% of a customer's top-up/vend) will remain the same maximum levels and not be treated differently to how they are currently recovered (i.e. emergency credit and standing charges recovered at a higher proportion of a customer's top-up/vend), but suppliers can choose to recover legacy debt and emergency credit & standing charges debt at a lower level if they so wish and if the customer agrees to it.

4. Prioritisation of Meter Deployment (Installation) for Vulnerable & Financial Hardship Customers

As set out in the consultation, there is scope for particular customer cohorts to be prioritised for meter installation once the deployment phase of the project commences. Two such cohorts may include those on the vulnerable customer Special Services Register and/or customers in Financial Hardship[15]. There are approximately 10,000 gas PAYG customers who are either registered as vulnerable, and/or in financial hardship.

As mentioned in the consultation, any prioritisation of a particular customer cohort would likely result in significantly longer deployment timelines overall, and the risk that these customers would potentially face any operational issues in the early stages of the new meters being in use without potentially, any ready-made solutions available immediately. The CRU also noted that the currently envisaged GNI plan to commence meter deployment in the most heavily populated towns and cities first should, in theory, mean that a high proportion of vulnerable and financial hardship gas customers would have their meters replaced early in the deployment programme regardless of whether they have been prioritised or not.

Furthermore, the consultation sought feedback from respondents on whether the replacement meters would be a suitable product for customers either on, or eligible to be on, the vulnerable customer register given that the Electricity and Gas Suppliers' Handbook recommends that PAYG meters are not offered to customers who are eligible to register on the Priority Services Register (section 7.6.4).

Accordingly, the CRU posed the following questions:

1. Do you believe that vulnerable customers, customers in financial hardship, or any other customer cohort, should be prioritised when deploying the new meters?

2. Do you believe the new gas PAYG meters would be a suitable product for customers either on, or eligible to be on, the vulnerable customer register? If not, do you think these customers should be encouraged to a billpay solution?

[15] In accordance with Section 8.1.11 of the CRU's Electricity and Gas Suppliers' Handbook a customer in financial hardship is a customer who is unable to make bill payments without financial assistance and finding themselves in regular arrears

Responses Received

The majority of respondents did not express a preference for any particular customer cohort to be prioritised when deploying the replacement meters. Primarily, respondents stated a general (non-prioritisation of any customer cohort) deployment would be the most cost-efficient approach stating that a general deployment strategy would still result in a high proportion of vulnerable and financial hardship customers having their meters replaced early in the deployment programme.

One respondent noted prioritisation would introduce operational complexity, as well as the need to monitor frequently changing customer circumstances (e.g. a customer would be prioritised mid deployment if they register as vulnerable).

Another respondent stated any prioritisation of specific customers should be considered on a case-by-case basis and not be a detriment to the project's efficiency.

Conversely, one respondent stated that these customer cohorts should receive the meter as early as possible given the increased service support possible on the new meter but noted the best way to achieve this may be to begin the deployment in the most heavily populated areas first.

Another respondent favoured prioritisation of financial hardship and vulnerable customers, albeit acknowledging that these customers may be the first to face any initial problems associated with the new meter, recommending that suppliers are proactive in communications with these customers and flexibility is given for unforeseen issues.

Several respondents also encouraged lessons learned from the rollout of smart PAYG meters be considered to ensure any specific needs of these cohorts of customers are addressed.

On the matter of the suitability of the meters for vulnerable customers, overall, the majority of respondents expressed the view that the replacement gas PAYG meters will be suitable product for this cohort, with the majority of respondents citing that the suitability of the replacement meters for vulnerable customers should be assessed on a case-by-case basis.

One respondent stated the new meters are suitable for vulnerable customers because of this new functionality (web top-up/vend), and stated customers should be allowed the opportunity to pick which product they think suits them.

CRU Commentary

The CRU agrees with the majority of respondents that a general deployment strategy, not prioritising any specific customer cohort, is the appropriate strategy. This will lead to shorter, less expensive deployment with less operational complexity.

The CRU notes that one respondent was in favour of prioritisation to vulnerable and financial hardship customers but accepted the CRU's acknowledgement in the consultation that there may be a risk in this scenario that, if any operational issues emerge in the initial stages of the replacement meters being in use, these cohorts could be disproportionately affected, potentially without any ready-made solutions. Proactive communications should reduce this risk but cannot guarantee all issues will be avoided. In any case, commencing deployment in the most heavily populated areas first would mean that a high proportion of vulnerable and financial hardship gas customers would have their meters replaced earlier in the deployment programme, regardless of whether these customers have been prioritised or not.

GNI is engaging proactively with ESBN (following its roll out of smart PAYG) to ensure that any lessons learned can be leveraged, particularly on how vulnerable and financial hardship customers can be appropriately supported throughout the new meter roll-out. The CRU is aware that the GPAYG Customer Care and Communications Working Group will discuss and develop targeted communications for these cohorts and present them to the CRU Consumer Stakeholder Group, which includes representatives from advocacy organisations, to ensure they are appropriate.

On the matter of the suitability of the new GPAYG meters for vulnerable customers, the CRU notes the responses not in favour of providing the new meters to this cohort. Despite the advantages of this meter over the old meter, the CRU accepts that vulnerable customers are still at a higher risk of disconnection by being on a PAYG product. Nonetheless, customer choice is vital and as such a PAYG option will remain for all domestic customers. It remains the case that in accordance with the Electricity and Gas Suppliers' Handbook (section 7.6.3), it is the supplier's responsibility to assess the suitability of PAYG products for a vulnerable customer.[16]

CRU Decision

Therefore, the CRU has decided that:

- The new gas PAYG meter deployment will not be prioritised for specific customer cohort(s).
- Customers on, or eligible to be on, the vulnerable customer register will have the choice of availing of a replacement GPAYG meter, should they wish. However, suppliers must

[16] Electricity and Gas Suppliers' Handbook

continue to assess the suitability of such customers for PAYG meters in accordance with the Electricity and Gas Suppliers' Handbook.

5. Conclusion

The CRU thanks all those who have responded to the consultation on the Detailed Design of the Gas PAYG Replacement Project. All the feedback provided is appreciated and will help shape the new metering system. The CRU also acknowledges and greatly appreciates the ongoing efforts and collaboration of industry stakeholders in advancing the Gas PAYG metering project. Their input has been instrumental in shaping the direction of this project and addressing key implementation challenges.

The CRU remains committed to working transparently with all stakeholders to ensure a smooth transition to the new meter system and to ensure the best outcome for customers when they receive their new gas PAYG meter.

The CRU will now progress a further consultation regarding the implementation of the relevant decisions made in this paper to the Electricity and Gas Suppliers' Handbook. In the meantime, the decisions made in this paper will allow GNI and suppliers to progress the market changes needed for the new system. The CRU intends for the upcoming Handbook changes and market changes to be implemented in 2026, allowing sufficient time for suppliers to prepare their systems ahead of meter deployment in 2027.