



An Coimisiún
um Rialáil Fóntais
**Commission for
Regulation of Utilities**

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Gas PAYG Meter System Replacement Project: Consultation on the Detailed Design

Consultation Paper

Reference:	CRU2025177	Date Published:	10/11/2025	Closing Date:	19/12/2025
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CRU Strategic Plan 2025-27

Vision, Purpose, and Values



OUR VISION:

Resilient, efficient, sustainable, and safe energy and water services for Ireland.



OUR PURPOSE:

We actively serve the public interest by regulating the provision of energy and water to Irish homes and businesses, while supporting the transformation to net zero.



OUR VALUES:

• Integrity • Professionalism • Openness • Accountability

Executive Summary

The CRU is inviting feedback from suppliers, industry groups, customer interest groups, members of the public and all other interested parties on the detailed design for the Gas Pay-As-You-Go (PAYG) System Replacement Project presented in this paper.

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 the Smart Metering programme for gas customers but was noted at the time 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 that consists of 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. This Detailed Design Consultation Paper, and the decision paper which will follow, are required for the technical aspects of the replacement system to be decided upon ahead of GNI and gas suppliers progressing detailed design and implementation of the proposed PAYG solution in 2026 (deployment process due to begin in 2027).

This paper focuses 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 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).

Next Steps

The CRU is seeking feedback by Friday 19 December 2025. Responses should be submitted through the dedicated CRU consultation platform which can be found on the CRU website [here](#).

The CRU will publish responses in full on the CRU website. Respondents should include any confidential information in a separate annex stating the rationale for not publishing this part of their comments.

Feedback to this consultation will be considered and used to form a decision paper which is expected to be issued in Q1 2026.

Where necessary, the CRU will incorporate any policy decisions related to the new Gas PAYG meter system as part of the next review of the Electricity and Gas Suppliers' Handbook.

Public/ Customer Impact Statement

The new gas prepayment meters will not only ensure the continuation of a Pay-As-You-Go service for gas customers but will also enable these customers to top-up 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 customer's credit balance will continue to be the basis for balance messaging, for example balance alerts and for potential disconnections and reconnections if the customer runs out of credit (i.e. customer's low balance will still determine the threshold for when a disconnection

may be queued, and likewise how much a customer will have to top-up by to get reconnected). However, this credit balance will no longer be stored and updated on the meter (as happens with the current meter), it will instead be stored remotely by the supplier and updated once per day.

This change in the mechanics of the meters will lead to changes in balance messaging. Instead of receiving balance alerts from the meter, customers will receive balance alerts from their suppliers through other agreed channels such as a web facility or mobile application (for Regular Balance Messages) or SMS (for Disconnection Warning Messages). Similarly, disconnection and reconnection will not be performed by the meter but remotely by the supplier and so the new gas meter system will require reliable cellular network signal. The change in meters will also mean that the customer's balance will no longer be displayed on the meter but will be available through other channels such as a web facility or mobile application provided by their supplier.

The High-Level Design Decision Paper for the project was published in June 2025, however this Consultation (and subsequent Decision Paper) are necessary to agree on some of the more technical aspects of the project which are critical to 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 2-4 years to replace approximately 110,000 meters.

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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
RBM s	Regular Balance Messages

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 2014.¹ The rollout of smart meters for electricity customers began in 2019, with ESNB recently meeting the 2 million installs milestone.

In 2022, the CRU received a submission by 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 whereby travelling to a nearby retail outlet to buy top-up credit had become more difficult for customers, it became evident that an online top-up option would be necessary going forward. Secondly, during the energy crisis, implementing a CRU decision to increase emergency credit for PAYG customers became difficult as the current system has only 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 avail of an improved prepayment service (both lifestyle and hardship), the meter system must be replaced.

This Consultation Paper (and subsequent 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

¹ [CER/14/046 High Level Design](#)

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 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. However, there were other topics touched upon in the High-Level Design Decision Paper which require further consultation in this paper, such as 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.

1.1.2 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 have 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 GPAYG 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 among suppliers and GNI. These three subordinate groups were accordingly for: IT Integrations, Customer Care & Communications, and Project Management & Implementation. The first of these subordinate groups began meeting in May 2025.

1.1.3 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](#))

2. Selection of Meter System

This section builds on the High-Level Design Decision, providing more information on the capabilities of the meter system(s) which may be available following the finalisation of GNI's meter procurement process in the first half of 2026.

2.1 Thin or Hybrid Meter System

In the CRU's High Level Design Consultation Paper ([CRU2024142](#)), it was noted that the new GPAYG meter system is going to be a Thin/Connected meter system solution. This system requires good cellular network as there is a SIM card embedded in the meter that allows communication to be sent to and from GNI and suppliers' systems. This is different to the current PAYG system, which would be considered a Thick/Non-Connected system, that does not have a SIM card embedded and the customer's balance is calculated on the meter itself.

However, 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.

The tendering process for the new gas PAYG meter system is ongoing and is expected to conclude in Q1 2026. Should a hybrid meter be selected, it is important that policy around the functionality of hybrid meters is decided. If a hybrid system emerged successful from the tendering process, the CRU holds the view that the meter should run in 'Thin/Connected only' mode. Although the cost of hybrid meter hardware would cost approximately the same as a 'Thin/Connected-only' meter, the cost of running two systems concurrently would incur much higher costs as two separate systems would need to be designed, built and operated by both GNI and gas suppliers. This would mean that the cost of the project would be much higher, which would ultimately mean higher costs for all gas customers as the cost would be socialised. It would also possibly cause a delay in the project, as preparatory work thus far for the replacement system has been for a 'Thin/Connected only' system. As the current PAYG meters have a very limited life left and these meters are no longer being manufactured, it is important that the new system be introduced as soon as possible. The CRU acknowledges that there will be a need for alternative solutions for a small number of customers who will not have sufficient cellular network to avail of a prepayment service with the new meter system, which is discussed in the next section of this paper. Furthermore, the rarity of hybrid meter providers also presents a

continuity of supply risk insofar as it is unlikely that GNI would be able to source a like-for-like replacement should the hybrid meter provider leave the market.

Questions

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?

2.2 Alternative Meter Solutions

While every effort will be made to provide the replacement gas PAYG solution to all PAYG customers, it is acknowledged that some customers will be unable to avail of it due to cellular 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. In such a scenario, the GNI is exploring various options including, for those in low cellular strength areas, the provision of additional antennae on the meters to boost signal strength. For customers however who do not wish to avail of the new system, or cannot/do not wish to access the internet to view their data, moving to credit meters may be the best option.

Question

1. 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?

3. Customer Experience

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

3.1 Disconnection & Reconnection Timelines

As mentioned in the earlier CRU consultation paper on the High-Level Design of the new Thin/Connected GPAYG meter system (December 2024), the disconnection and reconnection process will operate differently than the current GPAYG meter system.

Currently, when a gas PAYG customer reaches a negative balance or has used up all the available Emergency Credit, the supply of gas is cut off. This is because the customer's balance is calculated in the meter itself. When a customer inserts a topped-up gas card into the meter, they can restore gas supply immediately.

However, with the introduction of the new Thin/Connected GPAYG meter, the supply of gas will not be automatically cut when the customer reaches a negative balance and has used up all the Emergency Credit. This is because the meter is read remotely once per day and would require a signal from GNI to disconnect

Under the Thin/Connected PAYG solution, the amount of gas consumed would be sent from the customer's GPAYG meter to GNI and onwards to suppliers. It is in the gas supplier's system that the customer's monetary balance is calculated. As gas meters are powered by a battery, information to and from the customer's GPAYG meter will only be sent once per day to preserve battery life. Therefore, the customer will experience a delay in being cut off from gas supply. However, customers will be able to self-reconnect to gas supply by topping up (either online or at a retail store) and pressing a button on the meter before following a series of safety questions such as ensuring that all gas appliances have been switched off (to ensure gas appliances would not turn back on when there is nobody present at the premise, thus reducing fire hazard).

3.1.1 Proposed PAYG Meter Reading Timeline

Day "D" = Meter Read Data recorded on the customer's GPAYG meter

The GPAYG meter will be configured to record meter data from a 24-hour block of time between midnight and 11:59 pm (23:59 on Day "D").

Day "D+1" = Meter Read Data is collected, processed, distributed

The collection, processing and distribution of GPAYG meter read data from Day D takes place on Day “D+1”, commencing from midnight with the objective of providing the customer with their updated balance by 12:00 on Day D+1.

3.1.2 Self-Disconnection Warning Messages

In addition to regular balance messages, customers will need to be notified when their balance has reached a level which puts them at risk of self-disconnection. This may occur when the customer’s balance goes below a certain monetary threshold, or when their balance reaches a level below their average daily use. As outlined further in section 3.2.2, the CRU does not envisage proscribing the exact approach suppliers may take regarding the timing, content and channel of these messages, but the CRU would mandate suppliers to, at a minimum, send one self-disconnection warning message.

3.1.3 Overnight Self-Disconnection

As the GPAYG meter will only be read once per day, the customer will not be disconnected immediately once their balance has fallen below €0. It is proposed that the customer’s meter will be read between 00:00-05:00 daily. Where a customer’s balance is below €0 for two consecutive reads, the customer’s meter will self-disconnect between 00:00 and 05:00 (if the customer, having received Disconnection Warning Messages, did not top-up in the meantime). The customer will receive a notification once the meter’s valve has closed and they have been disconnected.

3.1.4 Multiple Daily PAYG Meter ‘Wake-ups’

It is proposed the GPAYG meter will only ‘wake-up’ once daily to collect meter data, and, to carry out disconnection requests from suppliers. This is to conserve the meter’s battery. However, a second daily wake-up in the middle of the day could allow for meters to self-disconnect during the day rather than during the middle of the night, thus removing the risk of customers waking up in a house without a gas connection (which would occur if the meter wake-up occurs at midnight). It must be noted though that a second daily meter wake-up would have a considerable impact on the expected battery life of the meters (a minimum battery life of 10 years is expected in the event of meters waking-up once daily).

Depending on whichever meter provider emerges successful from the tendering process, it may also be possible that a second meter wake-up (occurring in the middle of the day, rather than night) may occur solely for meters that have a self-disconnection command queued. This would

ensure that the meter battery is not needlessly wasted on a second wake-up. However, the technical feasibility of this will be better known when the tendering process is complete.

3.1.5 Alternative PAYG Meter ‘Wake-up’ Times

As outlined earlier, it is proposed that the GPAYG meter will ‘wake-up’ between 00:00-05:00 each night, the point at which a customer’s meter data is collected and meter will self-disconnect if the disconnection has been queued and the customer has not topped-up in time. It is also proposed that between 08:00 and 12:00 the customer’s GPAYG account will be updated with the customer's balance from the preceding midnight (when the meter woke-up). This means that, should a customer have a low balance and be at risk of self-disconnecting, they will receive a message by midday informing them that they must top-up. For customers who do not use the online top-up facilities, the timing of this alert should allow them sufficient time to purchase a top-up in a retail outlet.

However, CRU is open to alternative suggestions regarding GPAYG wake-up times. It must be noted that for some customers it will take up to 12 hours from the meter wake-up time to them receiving a low-balance alert. As such, any other meter wake-up time will have implications for the timings of self-disconnections, and customers receiving low-balance alerts.

The timeline below summarises the process of meter wake-ups and customers receiving Disconnection Warning Message. Any alteration to the proposed meter wake-up time of 00:00 subsequently changes the rest of the timeline. The current proposed timeline is as follows:

- **00:00 – 05:00:** GPAYG meters wake-up and collect the consumption data for the previous day. The waking-up of the meters is spread across five hours to avoid overloading the central system.
- **05:00 – 08:00:** The read-data of the previous day is sent from the central system to gas suppliers.
- **08:00 – 12:00:** The gas supplier receives the read-data, calculates the customer’s updated balance, and shares the balance to the customer app/web facility.

The below table sets out the pros and cons of the meter wake-up, and subsequent customer balance updates, occurring at this proposed time:

Pros of midnight meter wake-up	Cons of midnight meter wake-up
--------------------------------	--------------------------------

<ul style="list-style-type: none"> Ensures suppliers receive their customers' balance information earlier in the day, granting them greater time to issue the disconnection warning messages 	<ul style="list-style-type: none"> Customers with meters that fall below the disconnection threshold, and do not subsequently top-up, will experience their meter self-disconnecting at a time between 00:00 and 05:00, meaning that they may wake-up with up with no gas supply.
<ul style="list-style-type: none"> Ensures customer receives updated balance by midday, allowing ample time to go to a retail outlet to physically top-up their card if required 	
<ul style="list-style-type: none"> Allows customers who preferring topping-up online at least 12 hours to do so, should they require 	
<ul style="list-style-type: none"> Ensures that meters that have fallen below the disconnection threshold, and not been topped-up, will not be disconnected in the evening time; when it may reasonably be expected that the need for gas supply is greatest for heating and cooking purposes. 	

Table 1: Pros and cons of midnight meter wake-up

Following on from the above, the below example shows the timeline of a customer being messaged regarding a potential disconnection, and when they are disconnected should their balance fall below the disconnection threshold on a Monday (assuming meter wake-up at midnight):

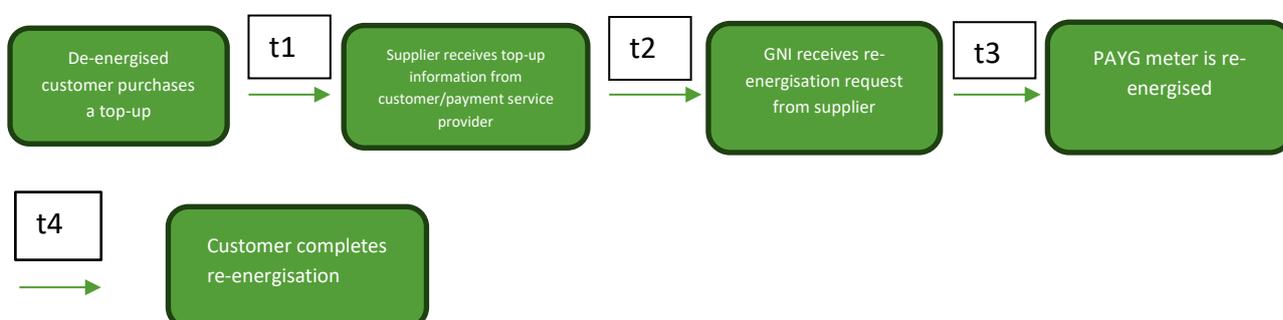
- Monday 00:00 – 05:00:** Customer's meter wakes-up and records €x of usage remaining.
- Monday 08:00 – 12:00:** Customer receives first disconnection warning message due to low balance.
- Tuesday 00:00 – 05:00:** Meter wakes-up and updates to record first midnight balance below €0, as customer has used their remaining credit and not topped-up.

- **Tuesday 09:00:** 21 hours since first disconnection warning message has been sent (this is the amount of time which must have elapsed between the first disconnection warning message being sent, and the disconnection request being sent by the supplier).
- **Tuesday 08:00 – 12:00:** Customer receives second disconnection warning message which informs them their meter will disconnect that midnight if they don't top up. Disconnection request is sent by the supplier.
- **Tuesday 23:00:** If customer has still not topped-up, disconnection request is sent by GNI to the meter (if customer tops-up between 23:00 and 00:00, disconnection should be avoided at meter wake-up).
- **Wednesday 00:00 – 05:00:** Meter wakes-up and disconnection message is received, valve closes and supply is cut-off.

3.1.6 Swift Reconnection

In order to manage the risk that a customer cannot get reconnected swiftly after a successful top-up, the CRU set out within the 2015 decision on Smart PAYG electricity an expectation for gas customers to get reconnected no more than 45 minutes after topping up by an appropriate amount, regardless of payment channel appreciating that re-energisation is a sequential process with a number of communications between parties (the meter, GNI, the supplier, and potentially other parties as well, depending on the payment timeline). However, the CRU believes that an overall backstop reconnection timeline of 45 minutes per its previous decision is maintained and will provide an appropriate overall customer experience for GPAYG customers.

As such, the CRU is proposing the re-connection process for gas PAYG customers would be as per below:



Where:

- t1 is the time between the customer completing the purchase and the supplier receiving the top-up information. This may heavily depend on the payment channel
- t2 is the time between the supplier receiving the top-up information and GNI receiving the re-energisation request
- t3 is the time between GNI receiving the re-energisation request and that request being transferred to, and available on, the meter so that the customer can complete the final steps in the re-energisation process'
- T4 is the time that the re-energisation is completed by the customer. This time is at the discretion of the customer.

To prevent safety risks, the customer will have to follow instructions to be determined based on the meter specification, to complete the reenergisation process. Customers will be required to confirm that gas appliances in the house are switched off at the time of reconnection. The CRU proposes that any messaging regarding re-connection clearly states the action(s) the customer must undertake on their meter once they have topped-up, either digitally or in a retail outlet, in order for their gas to reconnect.

Questions

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?

3.2. Balance Messaging

Gas meters are powered by a battery rather than electrical mains. As a result, and to prolong the battery life of the meter, GNI proposes that the meter will communicate with GNI once every day. As mentioned earlier, the minimum expected battery life is 10 years in the event of one daily meter wake-up. This communication will send gas consumption data, battery status and any alarm data to GNI (and onward to supplier's systems). The communication will also allow the meter to receive any valve open/close commands (e.g. to disconnect or reconnect a customer).

On current gas meters, customers can view their remaining balance by pressing a button on the meter to access the credit screen which shows the amount of credit remaining. With the new meter the balance may not be available to view directly on the meter. Instead, all suppliers will be required to offer an online platform where PAYG gas customers can view their balance, as outlined in the CRU's High-Level Design Decision Paper. Each supplier may design their own web-based solution for customers to view their balance to their specification. As well as providing a facility to view balances on a mandated web facility, suppliers may opt to offer a mobile facility (via an app) and/or a phone call facility for customers to provide customer balances.

3.2.1 Regular Balances Messages

When consulting on the Smart PAYG Electricity Meter in 2015², the CRU decided on a minimum requirement for customer messaging. One element of the customer messaging decided upon was the requirement for Regular Balance Messages (RBMs). RBMs are regular messages to customers that contain their most up to date credit balance and a balance estimate. In the consultation on the Smart PAYG electricity meter the default frequency for RBMs was decided as weekly. It was also decided that the Regular Balance Message must include an estimate of how long the customer's current credit will last, only where this estimate is less than 10 days, based on their previous usage patterns.

As mentioned in a 2015 consultation³ on PAYG, RBMs are likely the main driver of when customers choose to top up, because of this it may be necessary to ensure that minimum requirements for RBMs are in place for all PAYG products. The CRU is of the view that GPAYG customers will need to receive RBMs to ensure customers top up their balance regularly. In line with the decision regarding the Electricity Smart PAYG meter, the CRU proposes that for GPAYG customers, suppliers must, at a minimum, send weekly RBMs. The CRU also favours suppliers including in the RBM how long the customer's current credit will last, only where this estimate is less than 10 days, based on their previous usage patterns. The CRU is of the view the RBM will send a clear message/alert for the customer to top.

The CRU is of the view that for the communication of RBMs, suppliers must agree a contact channel that is suitable for the customer's needs. The CRU is proposing not to mandate any specific communication channel. Instead, it requires the customer's supplier to engage with the

² [Rolling out New Services: Smart Pay-As-You-Go \(CER/15/271\)](#)

³ [18 Rolling out New Services – Time-of-Use Tariffs and Smart Pay As You Go \(CER/15/136\)](#)

GPAYG customer at the point of sign-up to agree a suitable channel, which can be updated from time to time.

The CRU also proposes suppliers must offer customers the option for up to one additional household member (or person nominated by the customer) to receive the Regular Balance Message.

Questions

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?

3.2.2 Disconnection Warning Messages

The CRU proposes that suppliers must agree an Urgent Alert Channel for the Disconnection Warning Message that minimises the risk that the customer does not receive the message. The Disconnection Warning Message is an important deterrent in the disconnection process. The CRU views it appropriate, that as part of the contract sign-up process for GPAYG customers, suppliers must take steps to confirm the communication channel that minimises the risk the customer(s) does not receive the message. We note that this channel may be different to the Regular Balance Message channel.

The CRU is proposing that at least two Disconnection Warning Messages must be sent to the customer prior to disconnection. At least 21 hours must have elapsed between the first Disconnection Warning Message having been sent and the disconnection request being sent by the supplier to GNI. The CRU is also proposing that the Disconnection Warning Messages must:

1. Include the 'stay connected' top-up amount;
2. Be sent to the customer via SMS and be accompanied by an email/app notification;
3. Cannot be separately charged for by the supplier;

4. Suppliers must offer each customer the option for up to one additional household member (or person nominated by the customer) to receive the alerts, and advise the customer how to update their settings (e.g. alert channel or contact details) including the consequences of not doing this;
5. Include the time/date by which the 'stay connected' top up is needed to be made.

Question

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

3.2.3 Required time for customers to receive balance updates

The CRU believes suppliers should be required to make the Midnight Balance available to customers by a set time each morning. As previously stated, GNI proposes that the meter will communicate with GNI and suppliers' systems automatically once every day. Therefore, GNI will only receive customer usage data for a particular day (which is proposed to occur daily between 00:00-05:00). Once collected, GNI must validate and share consumption data with suppliers who will in turn inform the customer of their balance.

Up-to-date balance information is of critical importance to PAYG customers, allowing them to make proactive decisions about their energy use and effectively manage their energy costs. Therefore, it is critical that customers receive their balance from the previous day on the following day. This balance at a minimum should be available via the relevant Supplier's web facility.

The CRU is of the view that a sensible back stop time for the balance to be available to the customer is 12 noon (should the meter wake-up time be between 00:00-05:00) – so that the balance is never more than 12 hours old when the customer receives it. This means that should a customer have a positive balance at the start of the day, they will not be disconnected that day. Should a customer have a negative balance, they will receive a disconnection warning message and have the rest of the day to top-up their balance and avoid being disconnected.

Although GNI and gas suppliers have not yet finalised the detailed design of this solution, the CRU considers that it is appropriate to set a backstop customer experience level at this point in time in order to provide a clear direction on the minimum customer experience requirement.

Furthermore, one of the key requirements set out by CRU at the outset of this project was that customers should receive confirmation of their meter being topped-up as soon as possible following a vend. As such, the CRU proposes that the customer be notified by their supplier of their successful top-up and updated balance as soon as possible following the supplier receiving confirmation of the top-up. This notification should be communicated to customers via a push notification rather than a pull notification.

Question:

1. Do you agree that an appropriate back stop 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?

3.3 Solutions for those who may have trouble viewing balances

On the existing meter system, customers can view their balance directly on the meter screen. This will likely not be possible on the new meter, and it is likely that a small cohort of customers may have difficulty viewing balances if the only options available to them are a web facility or mobile app. It is crucial for customers to be able to check their gas meter balances because it helps them manage their energy usage and avoid unexpected disconnections. Many such customers rely on consistent gas supply and sudden loss of service could be harmful. See Section 3.5 below regarding CRU's proposal for providing vending options to customers. The below options are being considered regarding these customers being able to view their balance:

Option 1:

It may be possible for suppliers to provide a phone service whereby e.g. customers text a code given to them by their supplier or enter this code on an automated phone call. They would then receive a message with their updated balance. It must be noted that the balance communication would not be a real-time balance as it would only update following a meter 'wake-up', e.g. once daily between midnight and 5 am (should this be the meter wake-up frequency and time decided, see Section 3 above), or following a customer top-up.

Option 2:

A solution for such customers may be the ability to nominate a representative to look after bills and correspondence (which is already provided in the CRU's Electricity and Gas Suppliers' Handbook). In the same way, it may be suitable for some customers to nominate a

representative to manage their supplier provided web facility (and/or app) and monitor their balance.

Option 3:

It may be possible for GNI, or suppliers, to supply in-home-devices to some customers upon request. These devices 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'. Should such a device be provided by GNI, the balance displayed would not include a monetary value as GNI would not have individual customers tariff information. The viability of this option would depend on the infrastructure of the meter that is chosen in GNI's tendering process.

Question:

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?

3.4 Balance transfer (during meter deployment)

If the current PAYG meter is in-situ, it will be the responsibility of the GNI installer to record the credit and debt balances stored on the meter and transfer the information to the supplier. This follows the same process as currently exists for meter exchange of PAYG meters (for example, when a meter needs to be replaced due to battery issues).

However, there can be issues whereby the gas fitter cannot immediately transfer the outstanding credit or debit balance onto the new meter. In such cases, there is a process whereby the fitter can email the registered supplier the outstanding balance which they have been able to ascertain.

The CRU is wary that, given the increased complexities of exchanging a current meter for the new replacement gas PAYG meter, such difficulties in transferring the customer's existing balance may arise. The CRU is therefore proposing a 3–5-day period after the installation of a meter where suppliers are not permitted to disconnect gas supply to the customer for non-payment. There could be a number of other initial issues, for a small cohort of customers, after the installation of the new meter such as:

- **Technical adjustments:** New meters may require calibration or setup and may also have trouble communicating with the GNI system.
- **Billing Clarity:** Customers may need time to understand the new meter including attempting to use the app to add credit to their account.

This proposed 3–5-day period would give customers time to communicate any problems with their supplier to avoid the risk of being disconnected and would be unlikely to lead to customers accruing a large amount of debt.

Question

1. Do you think the proposed approach of not allowing suppliers to disconnect customers for non-payment in the first 3-5 days after installation of a new meter is appropriate?

3.5 Mandatory Vending Channels

In accordance with the principals set out by CRU at the outset of this project, and, the CRU decision on the High Level Design, it will be necessary for all suppliers to provide a web top-up facility for their PAYG gas customers at the outset of meter deployment. Each supplier may design their own web top-up facility to their specification. It will be the responsibility of each gas supplier to contract an online payment provider to provide the payment processing service that supports the web top-up facility.

As well as providing a web top-up facility, suppliers may opt to offer a mobile top-up facility (via an app) and/or may opt to provide a phone call top-up facility. Any mobile app would not need to be standardised. If a supplier chooses not to offer a mobile app however, then the supplier must ensure their web top-up facility is accessible via web browser apps on mobile devices. Should the supplier wish to offer a phone call top-up facility, the CRU proposes that this facility is not marketed widely in order for its service to be accessible to the smaller cohort of customers who may not be able to vend online for one reason or another.

As well as mandating a web top-up facility, the CRU emphasises that the new meters will not remove the ability of customers to top-up in-store should they wish to continue doing so. Suppliers must facilitate customers who also wish to purchase PAYG top-ups in retail outlets

either by cash or by debit / credit card. The CRU reminds suppliers that their in-store vending numbers may reduce over time.

Question:

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?

3.6 Estimated Meter Reads

GPAYG meters are designed to provide accurate and timely balance information by leveraging metering technology and secure cellular communications. However, there may be rare situations where estimated reads could be used to update meter reads and customer account balances, such as temporary signal interruptions. In the event that a read is not received from a meter on a given day, GNI can provide estimated meter reads to suppliers.

3.6.1 Updating Customer Balances

As outlined previously, energy suppliers will display on the mandated web facility each customer's daily gas balance by a specified time, reflecting the consumption data from the previous day. However, this balance may need to be based on an estimate provided by GNI in where an actual read cannot be provided to the supplier. In this situation, where an actual read is unavailable, there are three primary options:

Option 1:

Suppliers provide on the mandated web facility 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.

Option 2:

No estimation is calculated, and supplier shares an updated balance with the customer on the assumption that no gas was consumed (for the day of the estimation). When GNI provides an actual read, the balance will be corrected.

Option 3:

GNI will provide the estimated meter read to suppliers. It will be at the discretion of the supplier whether to display on the mandated web facility, an updated monetary balance to the customer 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).

Question:

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?

3.6.2 Self Disconnections based on estimated meter values

An estimated meter read will be calculated by GNI when 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.

If an estimated meter read is calculated by GNI, the CRU proposes that disconnections are not allowed on the basis of those estimates. This is because by their very nature, estimations may not reflect actual usage, especially if a household has changed its consumption habits. As such, the CRU proposes that any disconnection requests from suppliers be delayed until actual meter readings are available. This is in line with the existing CRU electricity Smart PAYG policy.⁴

Question

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

3.7 Customer Reverting to Billpay

In a situation where a customer who has a new gas PAYG meter wishes to revert to bill-pay, there are various options available to GNI concerning what they do next with the gas PAYG meter. The central decision is whether to retain the new-generation, replacement gas PAYG meter, adapting its mode of operation and associated data flows to cater for the billpay scenario, and facilitating remote meter reads and remote locks / unlocks; or to exchange the new-generation, replacement gas PAYG meter for a traditional credit meter, reverting to manual meter reads and manual locks / unlocks.

GNI stated their initial position is to retain the new-generation, replacement meter in-situ when a customer reverts to billpay (and therefore no longer needs the PAYG functionality). GNI estimate this would save between €1.1 million and €2.1 million over a 5-year period arising from avoiding the siteworks costs of exchanging the new-generation, replacement meter for a traditional credit

⁴ [Smart Metering Remote Operations-MCR1216](#)

meter. The other option is to remove the new-generation meter and replace it with a traditional credit meter, as summarised below:

Option 1 - Exchange New-generation, Replacement Meter for Traditional Credit Meter

This is effectively the status quo option as this is what currently happens customer reverts to billpay. Depending on the meter procurement, it is yet to be known if the removed new-generation, replacement meter would be re-usable at another premises.

Option 2 - Retain New-generation, Replacement Meter and Operate in Billpay Mode

Remote reads are switched off, meaning that the meter essentially operates in the same manner as a traditional gas meter used for billpay customers (typically referred to as a 'credit meter'). The meters will be manually read and manually locked or unlocked where appropriate. Note that the communications capability remains available for switching the meter back into PAYG mode should the customer subsequently revert to PAYG.

The CRU proposes option 2 above, where the new-generation replacement meter remains in-situ but neither remote reads nor remote de-energisations/re-energisations are possible.

Question

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

3.8 Granularity of Meter Read Data

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.

The CRU proposes a single read per day is taken by GNI. Half-hourly data is not necessary for the new gas PAYG system to function efficiently, 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.

It is worth noting that 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 with Data Protection Law.

GNI has confirmed that it will not utilise half hourly data for its purposes.

The introduction of half-hourly reads for gas PAYG customer would also create a disparity in services available across gas customers, as it would not be available to billpay customers.

Question:

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

3.9 Emergency Credit

Customers may avail of emergency credit once their meter balance has fallen below a certain threshold of credit. Currently, this threshold is at €5 credit (i.e. a customer can access emergency credit of €20 maximum as mandated by CRU, once credit on the meter is at or below €5). This is mandated by CRU and is set centrally by GNI on all gas PAYG meters (i.e. applies to customers across all suppliers). Emergency credit can be used in its entirety for gas usage, and is repaid (alongside standing charges) of future top ups.

Given the functionality of the new meters, it may be possible that both the emergency credit threshold (€5 credit) and emergency credit limit (€20) can be varied at the discretion of the supplier (rather than set centrally). This may be beneficial as either value could be altered to suit the consumption patterns of individual customers. In this scenario, the CRU would still mandate maximum and minimum values within which the supplier may set for customers.

3.10 Debt Recovery Hierarchy

The nature of debt recovery on current PAYG gas meters has been cited as problematic by both GNI and suppliers, as evidenced at the outset of Covid and the commencement of the CRU's Additional Customer Protection Measures where changes mandated by the CRU to the debt recovery ratio were difficult to implement.

The new system will facilitate an easier way for debt recovery ratios to be altered, and provides an opportunity for CRU to allow suppliers to implement the changes for their customers rather than GNI being required to centrally implement changes which apply across all suppliers. This means suppliers could be more flexible in their approach to debt recovery, tailoring it to individual

customers, or entire cohorts of customers, within the maximum limits which the CRU will continue to set.

Currently, the debt of a gas PAYG customer is recouped as follows:

Debt type:	Recovery from a customer vend:
Legacy debt	10%
Emergency credit	Emergency credit and standing charges grouped together and recovered pro-rata to one another, to a combined maximum of 35%
Standing charges	

The flexibility that could be offered by suppliers on the new system, may involve maximum and minimum debt recovery ratios (which would be set by the CRU if introduced), and differing debt recovery ratios for legacy debt on the meter and for standing charges debt.

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?
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?

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

In setting out the high-level requirements of the project in 2023, the CRU requested to GNI that customers at greater risk of self-disconnection would be prioritised for access to the new GPAYG meters. GNI confirms that 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, in accordance with Section 8.1.11 of the CRU's Electricity and Gas Suppliers' Handbook⁵ (i.e. a customer unable to make bill payments without financial assistance and finding themselves in regular arrears). There are approximately 10,000 gas PAYG customers who are either registered as vulnerable, and/or in Financial Hardship.

The replacement GPAYG meters may have functionality which benefits these customers, such as offering longer time to top-up before self-disconnection occurs and, remote top-up functionality (i.e. online/phone). However, there may also be a risk that if any operational issues emerge in the initial stages of the replacement meters being in use, those customers could experience those issues which may be difficult for them to manage, without any ready-made solutions.

GNI also confirms that if any cohort of customer were to be prioritised for installation, the deployment programme is likely to be significantly longer. The current estimated timeline provided by GNI for expected deployment of the new meters is H1 2027 to 2031. If specific cohorts, such as vulnerable and Financial Hardship customers are prioritised, the deployment programme would risk being delayed, potentially adding to the cost of the project. Should any particular customer cohort be chosen for prioritisation, it is expected that GNI (and suppliers if their assistance is required) would prepare measures to mitigate the impact this deployment would have on the overall deployment timeline.

The CRU understands that GNI will start deploying the new GPAYG meters in the most populated areas first, including cities and towns. Commencing deployment in the most heavily

⁵ [CRU Electricity and Gas Suppliers' Handbook 2023](#)

populated areas 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. Therefore, the CRU is supportive of either a prioritised or general deployment strategy starting with the most populated areas but is open to views on the matter.

Therefore, the CRU asks respondents to consider suggestions regarding the need to prioritise registered vulnerable customers, financial hardship customers, or both, alongside any potential pitfalls or benefits.

The CRU expects that should any customer cohort be prioritised, then a cut-off date for inclusion in any prioritised meter deployment programme will likely need to be determined to avoid any further potential delay to the deployment. This date is likely to be in the weeks prior to the commencement of meter deployment after which any customers who fall into the prioritised cohort will have their new meter installed as part of the broader deployment programme.

The CRU would also note that, as per the Electricity and Gas Suppliers' Handbook,⁶ that it is suppliers' responsibility to implement adequate and efficient processes to ascertain the suitability of PAYG meters for vulnerable customers, and it is recommended that PAYG meters are not offered to customers who are eligible to register on the Priority Services Register. The CRU has sought to provide alternative solutions to these customers via the Additional Customer Protection Measures which have been in place since 2022⁷.

Question:

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?

⁶ [CRU Electricity and Gas Suppliers' Handbook 2023](#)

⁷ [Additional Customer Protection Measures Decision Paper 2025-26](#)

5. Conclusion

The feedback received from this consultation will directly shape the next phase of implementation of the GPAYG metering project, helping to decide on critical elements such as solutions for customers with low connectivity, customer messaging and payment processing. The CRU remains committed to engaging openly with all relevant stakeholders and ensuring a transition which supports all involved.

We welcome stakeholder views on the proposals set out in this paper and encourage participation in shaping a PAYG system that works in the best interest of consumers across Ireland.

6. Next Steps

The CRU is seeking views from suppliers, consumer interest groups, industry groups, members of the public and all other interested parties regarding the questions raised in this consultation paper.

Feedback to this consultation will be considered by the CRU and a decision on the topics included in this consultation is expected in H1 2026.

Gas Networks Ireland together with its working group, will continue their work in designing and procuring a new gas PAYG meter system. The CRU acknowledges that the working group established by GNI for this project is operating well and that both GNI and the gas suppliers are aware and agree on the responsibilities they have in terms of delivery of the new GPAYG meter system on this project. The CRU therefore would like to thank GNI, and the suppliers involved for progressing this project in a meaningful way.

In time and where necessary, the CRU will incorporate any relevant decisions made into the next revision of the Electricity and Gas Suppliers' Handbook.