



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

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Gas Prepayment Meter System Replacement Project

Decision on the High-Level Design

Decision Paper

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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

In December 2024, the CRU published its first consultation on the High-Level design of the Gas Pay-As-You-Go Meter System Replacement Project. The CRU received 8 responses to the consultation and has carefully reviewed and considered all the feedback that was submitted. This decision paper notes all the main items that were noted and the CRU's decision going forward.

The current gas PAYG meters are coming to the end of their life due to ageing hardware and must be replaced. Severe weather events and the Covid-19 pandemic also illustrated the limitations of the current system including 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 includes PAYG gas suppliers and have been working with them to plan and design a new PAYG meter solution.

As the new meter system will work differently than the current gas PAYG system, the customer will experience some differences in PAYG service. For example, disconnection and reconnection will be done remotely by the supplier, rather than by the meter itself, so the new gas meter system will require reliable cellular network signal. As the new PAYG meter will be powered by a battery rather than by electrical mains for safety reasons, it is likely that there will be a delay in customers being disconnected from gas supply. However, customers will be able to press a button on the meter to reconnect to supply after topping up. This is just one example of the changes that gas PAYG customers will experience, and these will require changes to current policies which will be consulted on in H2 2025.

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 online. Without this replacement project, the current meters will become obsolete, and a gas prepayment meter will no longer be an option for customers.

The rollout of the new meters is expected to begin in 2027 and will take approximately 4 years for the 112,000 PAYG gas customer meters to be replaced.

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Glossary of Terms and Abbreviations

Abbreviation or Term	Definition or Meaning
GNI	Gas Networks Ireland
NSMP	National Smart Metering Programme
PAYG	Pay-As-You-Go

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 and is estimated to be completed in 2025.

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 recent energy crisis, increasing emergency credit for PAYG customers became difficult as the current system 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 meter hardware supporting the PAYG system is 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.

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,

¹ [CER/14/046 High Level Design](#)

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.

1.1.3 Related Documents

- Gas PAYG Meter System Replacement Project – Consultation on the High-Level Design ([CRU2024142](#))
- Electricity and Gas Suppliers' Handbook 2023 ([CRU202324](#))
- Smart Meter Upgrade – Consultation on Smart Pay-As-You Go ([CRU21046](#))
- Upgrade on the Smart Meter Upgrade ([CER17279](#))
- 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](#))

Information on the CRU's role and relevant legislation can be found on the CRU's website at www.cru.ie

2. CRU Consultation & Decisions

On 18th December 2024, the CRU published its consultation on the High-Level Design of the Gas Pay-As-You-Go Meter System Replacement Project. The questions posed in the consultation were:

1. Do you have any comments or concerns you would like to share based on the High-Level Design presented in this paper?
2. If you are an existing gas PAYG customer, are there any features that you would like the new meter system to have that would enhance your experience?

In total, the CRU received eight 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:

- Amalgamated Plumbing and Heating Contractors of Ireland (APHCI)
- Bord Gáis Energy (BGE)
- Electric Ireland
- Electricity Association of Ireland (EAI)
- Energia
- Flogas Natural Gas Ltd
- Saint Vincent de Paul (SVP)
- 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.

The main themes in the consultation paper were:

1. Thin/Connected System
2. System Overview
3. Data Collection from the Meter
4. The New Gas Meter Features
5. Other New Alternative Meter Solutions
6. Project Costs

Other topics were also raised in the consultation responses. These include a hybrid solution that can run in both Thin/Connected mode and Thick/Non-connected mode and a recommendation for an isolation valve and test point on the meter system. These topics are discussed further in the next sections. In some instances, more information is needed to give a final decision and as the project progresses, more information will become available. It is expected that the detailed design of the project will be consulted on in the CRU's H2 2025 consultation paper.

2.1 Thin/Connected System

CRU Consultation

The CRU consultation paper noted that the new gas PAYG meter system will be a Thin/Connected System and the reasons why this kind of meter system was chosen. It also noted the differences between the new Thin/Connected meter and the current gas PAYG meter system.

Responses Received

Most respondents noted that they are largely supportive of a Thin/Connected meter system and acknowledge the benefits that gas PAYG customers will experience with the new meter features.

One respondent noted that the system should not be “gold plated” or include designs that will drive unnecessary capital or operational system costs.

Two respondents noted that they are supportive of a “hybrid meter” solution that would work in both “Thin/Connected” mode and “Thick/Connected” mode.

Five respondents noted concern over issues that may arise due to the Thin/Connected meter systems being reliant on good cellular network. One respondent noted that during severe weather events, such as storm Éowyn that occurred in January 2025, some customers temporarily lost cellular signal. As such, there are concerns that customers may not be able to top-up during these events and as a result may temporarily lose gas supply. One respondent was also concerned regarding the potential situation during market message outages where a customer tops up their meter, but the suppliers may not have the means to reconnect their gas supply.

It was also noted that some customers may live in areas where cellular network is not strong enough to accommodate the new gas prepayment meter system and so they may no longer be able to avail of the prepayment service.

One respondent noted that for the electricity smart meter programme, which also uses cellular network for communications, there was a “30-day proving period”. This was used to determine whether a customer’s cellular network connectivity was good enough to ensure the system could operate sufficiently. They expressed that they would like to see a similar process be used for this new gas prepayment meter system.

One respondent noted that Gas Networks Ireland should include well defined Service Level Agreements (SLAs) as part of their contract with the chosen telecommunications service provider. As part of this they ask that the service provider identify “signal black-spots”.

Another respondent noted that there should be clear processes set out for customers who may need to be switched from a gas PAYG system to a bill pay system due to cellular network issues.

CRU Commentary

The new gas PAYG system will be a Thin/Connected meter system which will allow customers to avail of new features such as having an option of topping-up online via a mobile application or web portal.

The main purpose of this gas PAYG replacement meter project is to replace the current gas PAYG meters that are becoming obsolete and to offer customers an online top-up option. Any additional features or designs that the meter will have will be considered carefully and where appropriate, will be included in the H2 2025 consultation paper.

The “hybrid meter” solution is discussed further in section 2.7 below.

In relation to the reliance on cellular network, Gas Networks Ireland have included a requirement in the tender for a new meter system vendor that they must propose solutions for events where there may be cellular network issues. GNI are aware of some solutions that are currently in the market whereby customers will be able to restore supply of gas without the need for wireless communications. GNI will continue to review the solutions and recommend the best one for the new system. This will be communicated when the tendering process concludes, and the new meter system vendor has been selected.

Moreover, GNI are looking into carrying out a study to help identify the geographical areas that may not have sufficiently strong cellular network to operate the new gas prepayment system. However, it may be possible that some customers will not be able to access a PAYG solution. This means that it is also possible for a small cohort of existing PAYG customers, they may have to switch to a gas credit meter for which processes for doing so will be clearly set out by GNI.

In relation to the response regarding a “30-day proving” period to ensure signal/connectivity, should a Thin/Connected (only) meter be selected, GNI advises this will not be possible. This is due to the fact that a Thin/Connected meter system will require cellular network from the first day of meter installation however, GNI will test the signal during meter installation to ensure connectivity. It was also noted in the response that a “30-day proving” period could potentially work in a “hybrid meter system”. This is discussed further in section 2.7 below.

In relation to the comment regarding SLAs, GNI have confirmed that this will be included as part of the contract with the chosen meter system vendor.

GNI will also continue to consult with ESB Networks in relation to their experience in the area of communications reliability as they may have lessons learned from the National Smart Metering Programme.

CRU Decision

The CRU has decided that GNI should progress the project to tender for a Thin/Connected metering system such that it meets the CRU requirements including that the new meters be compatible with 20% hydrogen blends, customers should be able to reconnect to supply after topping-up without significant delays, and, customers should have an online top-up option as well as the existing in-store top-up option.

2.2 System Overview

CRU Consultation

In its consultation, the CRU set out the split of responsibilities between GNI and the gas suppliers in relation to the delivery of the different components of the new gas meter system.

The consultation also set out the high-level view of the data flow from the customer's new gas PAYG meter to GNI's systems, through to the Supplier's systems and onto a mobile application or web portal whereby the customer, if they wish, can view their balance and top-up online.

Responses Received

There were no responses received specifically on this topic.

CRU Decision

The CRU has decided that the split of responsibility will remain per the consultation paper being that GNI will be responsible for;

- Installing and maintaining the new PAYG gas meters
- Maintaining a record of meter asset data for all meters installed on the network and;
- Providing meter reads to suppliers

Gas Suppliers will be responsible for;

- Providing a PAYG billing system to calculate the customer's balance
- Providing an online and in-store service to allow customers to top-up their PAYG accounts and;
- Providing data to customers including but not limited to top-up, balance and consumption data

2.3 Data Collection from The Meter

CRU Consultation

In its consultation, the CRU explained that gas meters are powered by a battery, rather than by electrical mains, due to safety concerns. Therefore, to prolong the batter life, GNI proposes that the meter will communicate with GNI and supplier's systems automatically once daily.

The CRU also stated that the matters relating to the granularity of the data collected from the meter, will be consulted on later.

Responses Received

The CRU received one response on this matter expressing a view that the new gas PAYG system should be able to collect and distribute both daily 24-hr reads and half-hourly reads for gas consumption. However, as the granularity of the data is still under consideration, and not yet consulted upon, the CRU will take this response into consideration later.

CRU Decision

The current gas PAYG meters collects 24 hours reads and communicates this back to GNI's systems when customers top-up and insert their gas card into the PAYG meter. Any move therefore to half-hourly consumption information would be a new feature. As previously stated, any decision to collect and distribute more granular information than is currently the case will be consulted upon later.

2.4 The New Gas Meter Features

CRU Consultation

Meter Longevity

In its consultation, the CRU stated the intention that the new meter will have an expected 20-year life and the battery within it will have an expected life of approximately 10 years.

The new meter is also expected to be compatible with hydrogen blends of at least 20% as a future proof measure.

Customer Experience

The CRU consultation also set out, at a high level, how the customer experience of the new meter will differ to that of the current gas PAYG meter. This included topics such as the credit balance, top-up methodology, low balance alerts, consumption history, disconnection and reconnection to gas supply.

Responses Received

One respondent requested clarity regarding the new gas PAYG meters being compatible with blends in excess of 20% hydrogen and asked that if not, would another meter system be needed in the future.

Another respondent also made the point that the CRU's Additional Customer Protection Measures includes a waiver of the €200 fee of switch from a PAYG meter to a credit meter. Therefore, this together with Ireland's move away from fossil fuels, warrants thought for future-proofing the new project taking into account the significant cost involved for both GNI and suppliers.

In relation to disconnection and reconnection to gas supply, one respondent noted concern around delays in disconnection in the new gas PAYG meter system. They noted that customers who avail of gas PAYG meter services are usually already in debt or having financial difficulty. The delay in being disconnected from gas supply could mean that gas PAYG customers would accumulate debt during the time that they enter into a negative balance and are reconnected to gas supply after topping-up.

CRU's Decision

In relation to the matter raised regarding hydrogen blend, GNI does not envisage that a higher concentration of 20% hydrogen will be in the gas network within the 20-year lifespan of the new

meters. GNI also advise that through their research of the gas meter market, gas meter manufacturers are not currently producing meters that are rated for blends in excess of 20% hydrogen.

The CRU is committed to protecting customers particularly those struggling the most financially. Therefore, the CRU maintains the needs for a prepayment service for gas customers and thus investment into the new system is essential. The current gas prepayment meters are no longer being made and thus must be replaced as soon as possible.

The CRU notes the concern regarding timelapse in disconnection of customers, and the possible accumulation of debt by customers during that time. However, whilst the CRU has yet to consult on the timelines as these are not yet known, the CRU does have a similar policy in the electricity market, which takes account of this time lapse to disconnection.

2.5 Other New Alternative Meter Solutions

CRU Consultation

In its consultation, the CRU acknowledged that the new PAYG meter system may not be suitable for all gas PAYG customers. In particular, customers who may not have access to the internet to view their balance, and/or customers who live in an area where cellular network may not be sufficient, and/or customers who may have other concerns. It was noted that solutions for such customers would be discussed in a later CRU consultation.

Responses Received

One respondent expressed the view that gas PAYG customers who do not have access to a web portal or a mobile application should be given an in-home display or there should be a top-up via phone option.

CRU's Decision

The CRU will work together with GNI and its working group to consider different options for those who may not be able to avail of the new PAYG service and the matter may be consulted upon, where appropriate, as part of a later CRU consultation.

2.6 Project Costs & Governance

CRU Consultation

In the CRU consultation, it noted that GNI had procured the preparation of a costings report for the new gas PAYG Thin/Connected System totalling €111 million. As GNI and the PAYG gas suppliers are responsible for different parts of the new gas PAYG Thin/Connected System, they will bear the cost of their respective parts.

Responses Received

Five respondents noted that as the costs of this project are significant, that the CRU should ensure that the costs incurred by Gas Networks Ireland be reviewed and ensure good value for money.

The respondents also asked that they be informed by Gas Networks Ireland if the project costs exceed the estimated €111 million (GNI and gas supplier costs included).

CRU Decision

A provision has been made as part of Price Control 5 on Gas Networks Ireland for this gas prepayment meter system replacement project. “Price Controls” are a regulatory tool whereby the CRU sets GNI’s allowed revenues that are used to carry out its functions. These Price Controls are set every 5 years and at the end of every 5-year period, the CRU reviews the costs to ensure they were value for money and used efficiently. The funds put aside for the Gas PAYG meter replacement project will also be reviewed as part of that process. GNI also confirm that they will share the revised estimates for GNI’s costs with the CRU once the meter system vendor procurement process has been completed.

While GNI costs are regulated and therefore subject to CRU review as part of the Price Control Process, the costs incurred by gas suppliers are not subject to direct regulatory oversight and will not be tracked. Suppliers can choose the software and systems that suits their needs for the project (including web portals and billing systems etc). However, GNI will provide updates on any changes in the estimates for GNI’s costs and will advise the working group if the outcome of the tender process or subsequent detailed design leads to any substantial variations to the high-level design that GNI believes will have a material impact on suppliers’ costs.

2.7 Other Topics from Consultation Responses

Hybrid Meter System

In the consultation paper, it was noted that the new gas PAYG meter system will be a Thin/Connected System. Through GNI and the working group's research of new gas PAYG meter systems on the market, it was noted that a small number of meter system manufacturers could offer a "hybrid" meter system. This system would allow for both a "Thin/Connected" mode and a "Thick/Non-Connected" mode. However, operating a hybrid meter system would require two separate systems working concurrently which poses a number of issues. Running two separate systems would require more resources to design and operate, therefore delaying the project as it would take more time than the current estimated project timeline to deliver the overall project and service to customers. The current meters are no longer being manufactured and are reaching end of life so any delay in rollout of the new meters to customers, risks a PAYG service not being available. Operating two separate systems will be more costly leading to higher costs for all gas customers.

In favour

Two respondents noted that they are in favour of a hybrid meter system that would run in both "Thick/Non-Connected" and "Thin/Connected" mode. "Thick/Non-Connected" mode does not require cellular communication signals to operate and the data such as energy consumption, would be stored on the meter as opposed to their gas supplier's system until they topped-up. "Thin/Connected" mode requires cellular network signal to allow data such as energy consumption to be sent to their gas suppliers. These meters also give customers the option to top-up online as well as at a retail outlet. Hybrid meters cater for both "Thick/Non-Connected" and "Thin/Connected" modes and can be switched remotely by gas suppliers.

The reasons for being in favour of this dual system would be that it would allow customers, who do not have access to the internet or live in areas with weak cellular network signal to continue to avail of a gas prepayment service. These customers would have a "Thick-Non-Connected" mode system.

One gas supplier also noted in their response that they currently only provide gas prepayment service to those in "financial hardship" rather than customers who choose to have one to help manage their bills. Therefore, if a hybrid meter was chosen and both the "Thick/Non-Connected" and "Thin/Connected" system worked in parallel, that a "Thick/Non-Connected-only" mode would replicate the current service. The respondent noted that this service would cost less to provide and would also be an option for new gas supplier entrants onto the market who may view the larger investments into a "Thin/Connected" mode as a barrier to entry.

Another reason in favour of the hybrid meter would be that it would ensure the continuation of service to gas prepayment customers during severe weather events whereby cellular network services may be affected. Furthermore, it was also noted that this could also ensure robustness during potential cyber security threats. If the meter was switched into a Thick/Non-Connected solution, any risks of improper issuing of de-energisation requests would not occur.

Not in Favour

One respondent noted that they would not be in favour of a hybrid meter solution with both “Thick/Non-Connected” and “Thin/Connected” modes in operation. The reason noted for this being that gas suppliers should not be expected to manage two separate gas prepayment meter solutions concurrently. The extra costs incurred by the supplier to run the two systems would mean higher prices for gas customers as the cost would be socialised across all gas customers.

CRU Decision

As part of GNI’s meter system procurement process, hybrid meter solutions will be considered. However, if a hybrid solution wins the tendering bid, GNI have recommended that it be used in “Thin/Connected” only mode. The reason for this being that 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 all work so far has been for a “Thin/Connected” mode 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.

If a hybrid meter solution were to win the procurement process and it was decided that two systems were to be run concurrently, suppliers who only wish to provide a “Thick/Non-Connected-only” solution would have to be consulted on and considered separately.

The CRU does recognise that there may be a need for alternative solutions for a small number of customers who may not have sufficient cellular network to avail of a prepayment service with the new meter system. However this issue is being explored by GNI and when appropriate, the CRU will consult on the matter when more information is known.

As noted earlier, GNI and its working group are looking into solutions for events such as severe weather events whereby cellular network signals may be temporarily out of order and where the customer could continue to top-up and retain gas supply. This will also be considered by CRU and will be consulted on further when more information is known.

Transition Policy from Old Meter System to New Meter System

Responses Received

Two respondents noted that consideration should be given to the phasing out of the old gas PAYG meters to the new gas PAYG meters. The rollout of the new gas PAYG meters is expected to begin in 2027 and last until 2030. During this period, the old and new meter systems will be running concurrently and therefore the respondent raised that suppliers will have costs associated with running both systems. Gas suppliers have noted that to ensure costs to suppliers are kept to a minimum during this transition period, that this topic be included in a future CRU consultation.

CRU Decision

GNI are currently negotiating a contract extension with Siemens who are the current gas PAYG meter software provider. This extension will be of the current contract that is in place with Siemens for the current GPAYG system. Gas suppliers currently pay a transaction fee to Siemens for every customer top-up. This contract extension will ensure that the software will remain in place for the current gas PAYG meter system until all the new meters have been installed.

The CRU has decided that GNI will work with suppliers on this matter, to agree a transition plan to the new system, and ensure that it keeps suppliers apprised of progress (through the Gas Markets Arrangements Retail Group (GMARG), and working group including holding information sessions and workshops with suppliers on the topic.

Customer Communications Strategy

Two respondents stated that it will be important that customers who have the new gas PAYG meters installed are fully informed on the differences between the current gas PAYG meter and the new system. The respondent stated also that this would help customers understand the new gas PAYG system and it would also help reduce the number gas PAYG customer queries to gas suppliers' customer care teams.

CRU Decision

Given the very early stage of this project, a customer communications strategy is yet to be developed. It is envisaged however that the strategy is likely to include written communications to all relevant customers, explaining how the new meter works and what this means for them. This will be supported by clear FAQs on GNI and supplier websites, as well as suitably trained customer call centre staff who can also answer queries from customers prior to, and during roll out.

Until a strategy is developed and implemented, the CRU requests GNI to include discussions on the matter at its working group, and in due course, bring forward for approval at GMARG, a suitable communications plan, on behalf of, and agreed, with the working group.

Separately, the CRU envisages that the matter of customer communications will be included in a CRU consultation later, when more is known in relation to the new meter, during selection and detailed design.

GNI is requested to keep CRU updated on developments in terms of communications strategy., taking into account the customer journey.

Customer Protection

One respondent noted a number of ongoing concerns for the current gas PAYG customers such as self-disconnecting due to financial hardship. The respondent recommended that the CRU conduct research to understand the extent and impact of self-rationing and self-disconnection amongst pre-pay customers and to use this to inform further consumer protection responses.

The respondent also noted that some PAYG customers and representative/intermediary organisations that will be affected by the changes to the system, may not be able to engage with the consultation process due to materials being presented for a technical audience. It was recommended that this could be done through creating alternative consultation materials in everyday language or conducting workshops for direct and proactive engagement.

CRU Decision

The CRU will carry out another review of the current Additional Customer Protection measures in Q2 2025 and will publish its decision in Q3 2025. These measures to are to help protect all customers but in particular those energy customers who are experiencing financial difficulty. Unfortunately, there is very little quantitative data available on self-rationing and self-disconnection due to the nature of the gas PAYG meter system and, were any data available, it would not be accompanied by socio economic or demographical metrics and as such very little insight would be gleaned that the CRU could action within its remit.

In terms of communicating with customers, the CRU endeavours at all times to develop and write its consultation papers, and other communications with the general public audience in mind. However, it does acknowledge that some of the material can sometimes be technical in nature. It is intended however that the written communications to customers in relation to the new gas PAYG meter system and what this means for customers will be in plain-simple English.

Isolation Valve and Downstream Test Point

One respondent raised a technical matter which the CRU provided to GNI for a response. The respondent expressed a view that all new gas meter installations or meter replacements should have an isolation valve and downstream test point at the meter outlet connection point to the downstream/consumer's pipework.

This was suggested to eliminate reservoir effect issues and the need for a Registered Gas Installer to dismantle the meter when carrying out certain tests.

CRU's Decision

The CRU asked GNI for a response on this technical matter. GNI's response stated that the current specification for the proposed PAYG meters includes an internal valve and a test point on the outlet boss of the meter. However, GNI has advised against testing the customer's pipework against this valve as it is only designed to be used in the case where the meter has run out of credit. This is in line with section 7.13 of Standard I.S. EN 16314 which states that "*The valve requirements are only intended for interruption of the gas supply and shall not replace any valve intended to isolate the gas supply*".

Gas Network's Ireland also noted that Standard I.S. EN 16314 allows for an internal leak rate for the valve in the meter which is 250 times higher than the internal leak rate allowed for an isolation valve. Its intended use is to interrupt the supply of gas but not to isolate the gas supply. This is why it is not recommended that this valve in the meter be used as an isolation point to test the downstream pipework.

In addition, if an isolation valve and downstream test point at the meter outlet connection point was in place, the Registered Gas Installer would need access to the metering system to open or close the valve and this would increase the potential for meter tampering.

3. Conclusion

Overall, the responses from this consultation are positive and respondents view the new gas PAYG replacement system project as being a positive step towards ensuring a continued prepayment service, as well as providing customers with a better customer experience. Gas prepayment customers will be able to avail of online top-up services as well as still having the option of topping up in a retail store.

The CRU thanks all those who have responded to this consultation on the High-Level Design of the Gas PAYG Replacement Project. All the feedback given is very much appreciated and will be taken into consideration when planning the more detailed features of the new metering system.

The CRU envisages a further consultation later in 2025.

4. Next Steps

Gas Networks Ireland together with its working group of gas suppliers, will continue their work in designing and procuring a new gas PAYG meter system. The CRU will work with GNI and the working group over the coming months to create policies that are effective, represent the best value for money and ensure that the customer's interests are at the heart of the decision-making process.

The CRU would like to once again acknowledge the work done so far by GNI and its working group in progressing the project.

It is expected that the CRU will publish another consultation on the more detailed design of the gas PAYG metering system when more information is known, later in 2025.