

Dear Sirs,

CPL Concordia is an Italian company involved in energy, metering and meter manufacturing. Please visit our company profile at www.cpl.it.

We are happy to reply with our contribute to your public enquire. For sure you know that the Italian Authority has already launched the program to replace all gas meters (above 20 Mil pcs) within the 2016 and we are playing a key role for gas meter supply and services.

I'm personally also involved in CIG committee (Italian Gas Committee) and taking part of CEN TC237 for developing new specs on gas meter under the European mandate.

Please find below your question followed by our answer in blue colour and consider that we are open for punctual cooperation with you.

Q/A:

Question 6: Do you have any comments on the functional requirements for the smart metering system we have set out in the Functional Requirements Catalogue? (*Deadline for response: 28 September*)

We found the Functional Requirements Catalogue a complete overview of all functionalities. Of course the Technical specification are clearing missing due to the fact are planned afterwards. In our opinion we will suggest to evaluate that:

- 1) Hourly storage of consumption with 2 month archive can be enough
- 2) 15 years battery lifetime in the gas meter can be in contradiction with the feedback time requires by certain services. To withstand 15 year battery, the feedback time to DCC request on-demand toward the meter, should remaining around 24 hours . So that, in that case, the meter modem can stay OFF most of day, using the approach of sleeping mesh radio.
- 3) The sleeping mesh concept may become compulsory in case of battery powered HAN repeaters or concentrators.
- 4) To envisage SIM card that allow the chance to chose dynamically the best operator in that area (best GSM-GPRS field intensity).
- 5) We recommend that SMDG will adopt only 1 type of HAN protocol and radio technology to achieve end to end interoperability

Question 7: Do you see any issues with the proposed approach to developing technical specifications for the smart metering system? (*Deadline for response: 28 September*)

We fully agree to leave to SMDG the final draft of tech specification, than the following final draft will be agree in plenary session with OEFGM

Question 16: Do you have any comments on the proposals for requiring suppliers to deliver the rollout of smart meters (including the use of targets and potential future obligations on local co-ordination)? (*Deadline for response: 28 September*)

We suggest to start from non-domestic meter replacement, due to the fact that the number of non-domestic meter is low respect to domestic meter, but the gas consumption is higher, and it is usually used point to point communication. For all those reasons, we can than appreciate and validate all sw features about tariff, billing period , remote download, security and so on , before coping with all other variables about infrastructure (HAN & WAN) and massive deployment typical of domestic meter .

We'd rather prefer a meter functionality validation before passing through the HAN & WAN of domestic meter.

About roll-out strategy, we suggest an area-based approach, in order to increasing the number of meter installed each day , by simply managing the best GPS routing.

We also suggest to apply the option of 'target for completion of rollout', stating, years by years, by non domestic meter, than th 5% of domestic meter, than the 30% of meters every year.

About testifying the correct supplier meter roll out, we suggest to use the 'already working at that time' DCC sw, with automatic report of the meters that have been successfully read.

As codes of practices around the installation process, beyond envisaging a perfect procedure about password and key encryption management , we suggest to standardize the flow chart about DCC self-populating during installation, by using in the costumer premises the right PDA for

activation and meter bar code tracking, with a complete coordination PDA-DCC via Web services to acknowledging step by step the installation phase.

Question 17: Do you have any comments on our implementation strategy? In particular, do you have any comments on the staged approach, with rollout starting before DCC services are available? (*Deadline for response: 28 September*)

Before the GO-Live rollout (summer 2012) we suggest to have the DCC sw completely working in order to start by the DCC an early stage of 'meter approvals' in order to enhance end to end interoperability test before starting massive installation

Question 19: The proposed timeline set out for agreement of the technical specifications is very dependent on industry expertise. Do you think that the technical specifications can be agreed more quickly than the plan currently assumes and, if so, how? (*Deadline for response: 28 September*)
We think that after establishing the final requirements, technical specifications can be fixed within 1 years and only after 1 year more the meters maybe ready by manufacturer for first pilot.

Do not hesitate to public our reply also with the sender company coordinates.

Kind Regards
Eligio Bertoli,

