



Smart Metering Implementation Programme Consultation Paper Response

Overview

Orsis (UK) Limited (Orsis) are an industry registered Meter Asset Provider (MAP) and Data Retriever (DR). Orsis manufacture data logging devices and electronic GPRS data retrieval equipment for the electricity, gas and water industries. Orsis provide remote data retrieval services and provide electronic meter reading to both the electricity and gas industries alike.

Orsis have specific stakeholder interest in the implementation programme to help the supply industry realise the economies that our solution delivers through low frequency mesh radio networks and also enable the organisation to forecast and plan manufacturing capacity to help facilitate the Government's implementation programme.

Orsis have multi-utility experience and have commercial interests in the MOp / MAM activities in delivering smart metering solutions across all utilities.

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On Behalf of: **Orsis (UK) Limited**

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Responses to Questions given 28th September Deadline.

Chapter 2.

Question 3. Do you have any comments on the proposed approach to ensuring customers have a positive experience of the smart meter rollout (including the required code of practice on installation and preventing unwelcome sales activity and upfront charging)?

Comments:

1. Suppliers appointing Independent MOPs could assist in the prevention of unwanted sales activity.
2. Customer's positive experience can be maintained/improved by metering and data retrieval equipment being installed in a single engineer visit with MOPs installing both electricity and gas logging equipment concurrently. This will result in less consumer disruption and may also encourage dual fuel conversion for suppliers. This would be achievable for many properties where the gas meter already has a pulsed output. This will also enable supplier to achieve economies in terms of installation resource and metering/data logging



equipment. Using a single supplier/MAP for metering equipment that uses a unified communications method for both utilities will also provide economies to the supplier.

Chapter 3

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?

Assuming all safety standards are met (or exceeded) we believe that the supplier and valve/meter manufacturers should be responsible for the energisation/de-energisation of the gas meters. This would enable the data logging devices to operate independently to provide meter reading.

We also believe that the meter manufacturers should be responsible for guaranteeing the pulse scaling identified on the gas meter index is accurate. From our experience of retrofitting gas data loggers onto existing pulse enabled gas meters, often the pulse scaling identified on the gas meter index is incorrect.

1.38 – GS 4. The smart metering system shall support the capture of gas consumption data at 5 second intervals.

Although this point does not imply the data has to be transmitted or stored at this interval, there would still be a serious impact on the battery life of the data logging device as communications between the meter pulsed output and the logging device would remain open.

1.41 – HA. 13. The HAN interface shall support gateway/bridging devices to access data made available on the HAN.

The interoperability between the HAN and the support of gateway/bridging devices would tend to suggest the use of public spectrum Wi-Fi 2.4GHz radio communications. This would possibly lead to the over use of the radio spectrum and result in radio interference. The spectrum is currently widely used with multiple devices able to communicate on this spectrum, which enhances the potential of security issues on consumer data and home Wi-Fi networks. This would also possibly result in necessitating multiply radio transmitters into HAN devices, further increasing costs. A possible feature of the HAN communications device is to provide a USB link or Ethernet link on a locally based data concentrator to allow for consumption data downloads to a home computer. Providing real time data via the internet would be prohibitively costly due to the WAN GPRS or GSM communications costs required to support real time data transfer.

Question 7. Do you see any issues with the proposed approach to developing technical specifications for the smart metering system?

5.20 ‘...we seek views on whether the programmes should place an obligation on suppliers to cooperate with developing the technical specifications.’

We believe that the technical specifications of the communications, data logging devices and meters should be driven by the manufacturers and Meter Asset Providers whilst the suppliers specify only the format in which data is delivered (specific to internal systems). This approach still requires input from the suppliers, but suppliers should have no direct obligation to participate.



Question 16. Do you have any comments of 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)?

3.50 '...We welcome the views on whether there is a case for special arrangements for smaller suppliers or for the non-domestic sector. '

From our experience, the smaller supplier will have less concentration of customers in geographical areas and therefore may find the targets more difficult to achieve and find the cost more prohibitive. Through the coordination and logistical cooperation of smaller suppliers and by engaging a single or a couple of independent Mops for smart meter installation works and perhaps standardising on specific meters and communications devices, targets similar to the large suppliers could be realised. Furthermore, the non-domestic sector provides differing challenges, mainly for out of hours installations. This scenario increases costs for the supplier and MOp and slows down the adoption and installation rates.

Chapter 4

Question 17. Do you have any comments on our implementation strategy? In particular do you have any comments on the staged approach, with roll out starting before DCC services are available?

We believe that the staged approach is necessary to allow the programme to commence at the earliest opportunity. The early adopters of the technology may even drive alterations to the DCC service prior to launch. This also gives the industry the opportunity to iron out any potential 'snags' prior to full launch. This approach must also take into consideration the technical specifications to be interoperable with existing systems and allow for a simple and cost effective migration of existing smart meter data into the DCC.

Market-led implementation: There would be considerable cost and implementation benefits to suppliers in coordinating roll outs using a single smart metering system supplier for metering, for example, blocks of flats/apartments where utilities are located in a single location. This would dramatically reduce costs through reducing the number of communications devices required, hence reducing GRPS or GSM costs. This type of work could be conducted by independent MOps to avoid any conflict of interest.

Question 18. Do you have any other suggestions on how the roll out could be brought forward? If so, do you have any evidence on how such measures would impact on the time, cost and risk associated with the programme?

We suggest the roll out could be brought forward by the Government (and/or Agencies) facilitating larger pilot schemes using proven smart metering technology through suppliers and other agencies such as EST. Consumers could be offered incentives similar to those presented by the Green Deal to take part in early adoption programmes based on regional coordination.



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?

We believe the technical specification could be agreed earlier if existing technologies are adopted for data communications that largely deliver the requirements set out in the Requirements Catalogue.

Question 20. Do you have any comments on our proposed governance and management principles or on how they can best be delivered in the context of this programme?

We believe the governance and management principles should ensure the sharing of information between all stakeholder and support smaller and independent stakeholders to allow for fair hearing, consideration and adoption of all recommendations, suggestion technology types and communications methods.