



## **COMMENTS ON QUESTIONS 6, 7 AND 19 OF THE OFGEM/DECC SMART METERING IMPLEMENTATION PROSPECTUS**

### **THE UK METERING FORUM**

1. The UK Metering Forum is a trade association open to providers, owners and operators of electricity metering assets. It is an unincorporated association to which Gemserv Ltd provides the Secretariat and a Consultant assists with specialised collective services on behalf of members, mainly connected with interfacing to UK and European legal metrology bodies and other trade associations and with representation on standards bodies.
2. The UKMF does not involve itself directly in the commercial activities of its members or in commercial arrangements between members and, as such, strictly observes the requirements of the Competition Act, 2000.
3. The following is a submission relating to implementation of smart metering in the UK. Comments are relevant only to electricity meters.

### **RESTRICTION OF THE RESPONSE**

4. The AMO is one of two trade associations for providers of metering services in the UK – the other being the Association of Meter Operators (AMO). The AMO deals mainly with market issues and the business of Meter Operators, whereas the UKMF covers all aspects of meter services (MAP and MAM) but deals mainly with European and UK legislative matters and representation in work on relevant standards and by other industry bodies, such as ELEXON and IMAG.
5. This response therefore deals with 'urgent' questions 6, 7 and 19, which are related to UKMF activity. It is understood that the AMO will comment on questions related to 'business' (eg rollout, training, etc). Also, both may comment further on relevant questions for which a response is required by 28 October 2010.

### **Q6 – Functional Requirements**

The list of functional requirements as set out in Appendix 2 of the Statement of Design Requirements appears to be extremely comprehensive and well researched. Particular comments on the Statement in general are

1. It is noted that the objective is to use these functional requirements to produce technical specifications which will need to be notified to the European Commission as per Directive 989/34/EC. Obviously the sooner this can be done the better in case there are objections from any quarter which might delay implementation. Also noted is the view - with which UKMF members agree - that these are in line with work being done at the European standards level in response to Mandate M/441, which should help avoid any challenge although this work is not yet developed in the same detail as regards functional standards. Timing is of the essence so as to avoid delay but ensure no 'surprises' from this quarter!
2. Point 3.4 limits the power consumption of smart metering equipment (presumably this applies only to the equipment shown as a 'smart metering system' in Figure

- A2.1 of Appendix) to 2.6 W - is this on the consumer or supply side? Current legislation allows up to 10W on the consumer side (although modern metering equipment does not consume anything like this) – where has the figure of 2.6 W come from?
3. Point 3.7 requires storage of half hourly consumption data, in line with the BSC requirements. It should be noted that the European Regulators (ERGEG) are suggesting in their Smart Meter Consultation Paper that periods of 15 minutes are stored.
  4. Point 3.25 refers to the ability to 'broadcast' precluding some WAN solutions. Currently the Radio Teleswitching system has this facility (albeit restricted to particular groups of switches rather than on a widescale basis) but it is understood to be hardly used. Is there some particular thought about broadcasting being a required application for some party?
  5. In point 3.38 there is reference to switching of load as for Economy 7 installations. In anything that replaces a Radio Teleswitch in this respect it should be remembered that the RT has a random switching offset to 'ramp up' the load to prevent system collapse if it all came on at once! This also refers to point 1.19 of Appendix 2
  6. Point 4.21 refers to new forms of disconnection including so-called 'trickle disconnection' although nothing seems to be specified in the detailed sections PC or ES about this.

## **Q7 – Developing Technical Specifications**

UKMF members feel that it is important to involve users and manufacturers in the preparation of Technical Specifications and therefore support Option 2 as in Figure 3, which Point 5.18 states is preferred. However some caution is suggested about mandating suppliers into this process as per point 5.20 – suppliers should be involved but may not have the required technical expertise (although they could be supported by appointed experts). The parallel in 5.17 with ELEXON work groups for CoP revision is useful

## **Q19 – Timelines for the Technical Specifications**

It is felt that the timelines for producing Technical Specifications are reasonable and achievable, as has been indicated. In response to the query as to whether the process could be speeded up, there is only going to be 'one-shot' with smart meter implementation and it is vital that the UK 'gets it right'. UKMF members feel that forcing the process into a shorter timespan runs the risk of undermining proper consideration of all aspects.