

Heat meter manufacturers,  
suppliers and other interested  
parties

Direct Dial: 020 3263 2726  
Email: [James.Woods-Segura@ofgem.gov.uk](mailto:James.Woods-Segura@ofgem.gov.uk)

Date: 14 July 2014

Dear heat meter manufacturers, suppliers and other interested parties

**Consultation on heat meter eligibility in the Non Domestic Renewable Heat Incentive Scheme: heat meters with strap on temperature sensors.**

We are currently examining whether the temperature sensors on installed heat meters which are external to the pipe (i.e. strapped on to the pipe) provide sufficiently accurate measurements to satisfy the relevant requirements of the Renewable Heat Incentive Scheme Regulations 2011, as amended (RHI Regulations).

Currently, to satisfy these requirements we seek evidence from applicants that satisfy the standards indicated below. These standards are the harmonised standards and normative documents under the EU Measuring Instruments Directive (MID) (2004/22/EC). We invite comments and feedback on the applicability of these standards and /or any equivalent standards that can be applied to satisfy the RHI requirements for temperature sensors installed external to the pipe.

In addition, we are also aiming to commission laboratory testing that will provide further evidence to enable us to understand the accuracy of these sensors.

We are now consulting on the applicability of the standards as further defined below in the section 'the current standards'. We invite you to submit your views by 14/08/2014. Please email responses to [James.Woods-Segura@ofgem.gov.uk](mailto:James.Woods-Segura@ofgem.gov.uk).

Unless you clearly mark your response confidential, all responses will be put in Ofgem's library and published on our website, [www.ofgem.gov.uk](http://www.ofgem.gov.uk). You can request for your response to be kept confidential, and we will respect this, subject to any obligations to disclose information, such as under the Freedom of Information Act 2000 or the Environmental Information Regulations 2000.

**Background**

One of the eligibility criteria under the Non-Domestic RHI Scheme is that applicants have to install "class 2 heat meters" as defined in regulation 2 of the RHI Regulations. This is a heat meter which:

- (a) complies with the relevant requirements set out in Annex 1 to the Measuring Instruments Directive

(b) complies with the specific requirements listed in Annex MI-004 to that Directive, and

(c) falls within accuracy class 2 as defined in Annex MI-004 to that Directive. Regulation 20(1)(d) of the RHI Regulations also says that all heat meters installed or used in accordance with the RHI Regulations must, where applicable, "be positioned to provide accurate measurements".

### **The current standards**

All applicants are required to provide evidence to demonstrate that heat meters satisfy the requirements in the RHI Regulations referred to above. For heat meters with temperature sensors mounted external to the pipe, we currently request that sensors have been tested to one of the following standards:

- a test according to EN-1434<sup>1</sup> (specifically following EN1434-2:2007 Heat Meters – Part 2: Constructional requirements). We expect a copy of a test report and checklist issued by an accredited test laboratory. For an accredited test laboratory we expect to see evidence of accreditation to ISO 17025, and the test report that underpins any certificate; or
- a test following the recommendations in OIML R75<sup>2</sup> (OIML R75-2 Part 2 Type approval tests and initial verification tests). We expect to see a copy of a valid OIML R75 Certificate of Conformity issued by a Notified Body; or
- an equivalent standard or test. If providing evidence for an equivalent standard or test, we expect applicants to provide information demonstrating that this standard is equivalent for the purposes of demonstrating MID compliance and positioning of the meter to enable accurate measurement in accordance with the RHI Regulations (eg standard/test approved by a notified body in the form of a MID EC Type (or Design) examination certificate for Annex B (MI-004) under the MID specifically for the temperature sensors and their mounting external to the pipe).

### **What happens next**

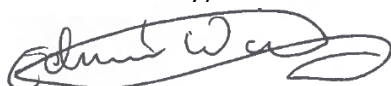
When the consultation closes on 14/08/2014, we will consider the responses and publish our response as soon as possible. We will notify applicants and other stakeholders when this happens.

If necessary, we will also consider revising our current Non-Domestic RHI guidance document.

For information on any of the standards in this letter please contact:

James Woods Segura, Assistant Policy Manager, Non-Domestic RHI at: [James.Woods-Segura@ofgem.gov.uk](mailto:James.Woods-Segura@ofgem.gov.uk).

Yours faithfully,



Edmund Ward  
Head of Technical, Non-Domestic RHI

<sup>1</sup>EN 1434 Parts 1 to 5: 2007 Heat Meters: <http://www.en-standard.eu/>

<sup>2</sup>OIML R75 Parts 1, 2 and 3: [http://www.oiml.org/en/files/pdf\\_r?b\\_start:int=100](http://www.oiml.org/en/files/pdf_r?b_start:int=100)