

Ofgem consultation:

Feed in tariffs Scheme: use of automatic meter readers for biennial meter verification.

**Question one: Do you agree with our proposal to allow the use of AMR data for biennial meter verification? Please provide evidence to support your answer.**

Yes we agree the use of AMR data for biennial meter verification.

Since the introduction for the Feed in Tariff (FIT) scheme we have observed two market segments that influence the type of meters deployed. The first segment are the privately owned systems where a private or commercial customer has invested in the full cost of the solar PV system installed onto a property. In the majority of these types of installs the meter used has not been of an AMR type and therefore the owner of the system will register the PV system with a Fit licensee and will provide their own manual read data for FIT payments. The second market segment is where the Solar PV installation are funded via a third party( Normally a bank or pension fund ) where the funder will install the system at their own cost and therefore will register the system and collect the FIT payments as part of the financial payback model. These types of installs are sometimes referred to as rent a roof schemes and are commonly how local authorities fund larger scales domestic PV installs onto social housing. In nearly all cases where third party funding is involved an AMR meter is used as the claim for FIT is critical to the financial proposition.

In the case where non AMR meters are installed there has to be an element of trust between the FIT licensee and the system owner that the data submitted is accurate. For the system owner it is very evident that the amount of payment received is directly associated to the number of kWh's they claims have been generated? This leaves the system open for manipulation albeit most Licensee would compare the reads submitted with national data and therefore should be able to identify systematic fraudulent claims.

In the case of the latter it is not just the actual meter reading that is of interest. In most cases 30 min profiles are also collected daily so the performance of the actual PV system can be monitored but also checked against national PV data which helps highlight underperforming systems or potential fraud. Because of the type and levels of data available for collection from AMR meters it is quite easy to highlight any potential tampering or faulty and inactive systems.

We would also like to mention that in the case of Non-AMR meters we are aware that many meters are supplied via wholesalers and therefore they can be supplied with either none, 1 or 2 decimal places on the meter display. This we believe adds confusion and potentially accentuates problems with incorrectly submitted readings.

**Question two: Do you agree with the methods of verification and sample size we have proposed. If not, what would you propose and for what reason.**

We would not necessarily agree that 5% of systems are randomly checked but we do agree some periodic verification is required. As we mentioned generation data can be compared to national data and this should allow licensees to identify potential problematic systems. It would seem more logical and more effective to focus on these than to take a random sample.

**Question three: Do you agree with the security measures proposed in this section? Are there any other security measures you think are required? If so, please provide reasoning and evidence to support your proposal.**

We certainly agree there should be a robust means of identifying the actual MID approved part of the installation however; this may not necessarily have anything to do with SIM management or the particular communications hardware used. In the case of GPRS communications there are a couple of ways to enable identification of the end point. Some will have a static IP address and port number assigned to the SIM and in this case SIM management will be essential to identify the particular meter you wish to collect data from. In other cases a port number and IP address are assigned to the actual communications hardware and managed within an ATP server. In this case the Sim installed becomes irrelevant to the identification of the meter. In the case of the latter management of the server database will be a critical element to ensure all Sims used are registered.

**Question Four: Do you agree with our proposals regarding standardisation of installation and commissioning methods of communication and data models? If not what alternatives would you suggest?**

Although we can see why some level of standardisation would have benefits we feel this would be a very costly and time consuming objective for the solar PV market. Today the AMR meters used are supplied from many different metering companies, most of which are using different communication protocols. Most data collection providers tend to integrate with one of two meter types and therefore integrate in conjunction with their appointed meter suppliers. To move to something like DLMS/COSEM will mean most data collectors of domestic installations (The vast majority) would need to redesign their systems for DLMS/COSEM while continuing support all of the legacy assets.

In relation to standardising on DLMS/COSEM we would see no additional benefit over what is currently being deployed and in fact this would increase operation costs for data collection. For GPRS communications it is essential to keep data rates to a minimum and we would be concerned that the extra data overhead required to run of DLMS/COSEM would be unnecessary and offer no additional benefit.

In relation to installation and commissioning we could see some benefit of guidelines and certainly for identifying a specific meter to a property. It would be our view that something such as the MPAN could be used in conjunction with the FIT meter serial number to identify that the correct meter is be read for the correct property. We would imagine this would also help the FIT licensee in validation of FIT reads with export metering data from the billing meter.

**Question five: Do you think that our proposals for monitoring and fault finding are suitable? If not what further guidance would you suggest?**

Yes we think your proposals are suitable and that the responsibility should be with the licensees. We would feel sufficient data is already available today for this type of monitoring.

**Question six: what methods would you propose as alternatives to physically reading non- AMR meter?**

We would feel today the best way to validate non-AMR reads would be through national PV GIST data where data for similar PV installs can be used for comparison. We would also point out that the difference between the overall cost of NON-AMR and AMR metering is minuscule compared to the overall cost of the system and this is why recently we see the ratio of non AMR installs reducing dramatically.