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By email

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Feed-in Tariffs Scheme: Use of automatic meter readers for biennial meter verification

Dear Andrew,

This is the British Gas response to the consultation issued by Ofgem on 18 December 2014, on the Use of automatic meter readers for biennial meter verification within the Feed-ins Tariffs Scheme.

Our detailed responses to your questions are set out in the Annex below.

Should you wish to discuss our response please contact me at graham.wood@britishgas.co.uk or on 07979 567686.

Yours sincerely,

Graham Wood
Regulatory Manager
British Gas

Annex

Question One: Do you agree with our proposal to allow the use of AMR data for biennial meter verification?

In principle we agree that the use of AMR data obtained from an AMR enabled meter, could be used for the purposes of biennial verifications. Whilst we believe that this could result in cost reductions for the Licensee, we concur that there would also be an initial cost outlay to both Licensee's and Generators.

The current process of physically inspecting the meter can result in access issues as the majority of these meters are situated in tenanted properties and Multi Site Generators have to arrange a convenient time with the tenant to gain access. This can mean several attempts at arranging appointments between the licensee, the third party meter readers, the Multi site generator, and the tenant.

Some AMR meters are situated in the lofts of properties which can present difficulties in obtaining a read as meter reading third parties are unable to access some lofts due to health and safety reasons. The use of AMR meters in these circumstances would address this issue.

We believe that the accuracy of the data that comes from the AMR to be robust. We have recently carried out sample testing and all readings sampled have been within tolerance of previous readings. We have also obtained photographs of some of the meters sampled which verified the readings.

Whilst we agree in principle, we would like to carry out a full impact assessment on the recommended options as we believe there will be costs associated with required upgrades to our internal systems, additional resource requirements, and additional internal controls to be put in place.

We would also require clarification on how to verify the different types and specifications of meters classed as an AMR. As referenced within the consultation document, meters using impulse loggers, LED pickups and other such technologies would not be classed as an AMR.

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 agree in principle with the three methods proposed to verify submitted AMR meter readings, and that Licensees be permitted to use, at their discretion, one or a combination or all methods to meet their verification requirements.

However, we would seek to impact assess all three of the proposed methods, to ascertain the implications of each and to establish the most efficient and effective method for both the Licensee and the Generator. Particularly we are interested in further understanding how we would obtain access to service providers systems, methods of sending the data, the format of data and any wider implications: and how the impacts are different per service provider, who may have varying systems.

With regards to the proposed Method two, auditing generator's systems and processes to ensure they remain compliant. This method would require the Licensee to contact all generators where an AMR is present. We would suggest that any additional requirements associated with the auditing of Generators could be included as an addition to the current annual declaration process, which would be a more economically efficient solution.

We agree with the proposed sample size of 5% on the basis that the risk of any fraudulent activity is minimal. We concur that a review of sample sizes should take place periodically, based upon findings and incidents found.

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 agree with the proposed security measures for AMR fitted installations. As a Licensee we have concerns relating to the process of identifying which AMR meters do not have the appropriate seals.

Licensees may therefore require a list of AMR meter types that are known not to have sealed composite units, so the appropriate advice and guidance can be provided to the generator as required.

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?

We agree that the current standards are robust and we should continue to use MCS certificates in the application process for confidence that the installation has been fitted correctly and to the specified standard.

We are interested in understanding what, if any, further documentation would be required to be provided by the installer to certify that future AMR meters have been manufactured to the DLMS/COSEM standard other than via the MCS certificate?

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

We are satisfied that the proposals for monitoring and fault findings are suitable and that no further processes need to be applied. British Gas have their own internal process whereby if a meter reading is not compatible with historical readings this will be flagged and investigated by one of our agents. Where this is not satisfactory we will then the generator to provide photographic evidence.

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

We would propose that the verification of non AMR meter readings could be provided by the submission of photographic evidence, provided by the Generator, to enable verification of the readings every two years. The evidence would need to include a date and time stamp and clear identification of the meter serial number, enabling verification against the details held by the Licensee. This evidence could subsequently be retained by the Licensee.