

Thank you for the opportunity to be involved in the consultation on Tuesday. Please find below my replies to the consultation questions:

FIT Generator Automatic Meter Reader Consultation

1. Do you agree with our proposal to allow the use of AMR data for biennial meter verification?

In our experience the use of physical visits to our properties to read the meters has proved very problematic and resulted in our FIT accounts being suspended where access could not be gained and the meter not verified. Therefore are very much in favour of AMR reads for the biennial meter verification

2. Do you agree with the methods of verification and sample size we have proposed?

I understand the need for the verification and the rationale relating to the size of the sample size. My preference would be for Method one, however, I have concerns that the data that would be required may not actually be available from our provider. I believe that they only keep the generation amount rather than keep records of the actual meter reading for a given day. It would be the actual meter reading that would facilitate Method One.

Tolerance checks where the reading is below expected causes problems when the PV is not generating. We have a number of properties where this is the case, i.e. they need a new inverter. I currently do provide a reason for those properties that fall outside the tolerance levels.

With regards to physically reading AMRs I would welcome some “best practices” for the licensee. As the Landlord of these properties we need to give notice to our tenants of any visits, and this is particularly the case when it is a third party company. We have had previous experience of tenants ringing up worried and confused by an unannounced visit. With social housing stock we have a larger proportion of venerable adults and so this is a great concern for us. My expectation would be that the licensee advise us of the homes they intend to visit. We can then notify those tenants by letter to expect the visit. I appreciate that finding a convenient time can be a challenge, more so than when the appointment is for a repair or something that the tenants view as something beneficial to themselves. However, if the licensee is not able to get access then we need to be notified, not just have the account suspended.

3. Do you agree with the security measures proposed in this section.

I agree with the security measures proposed and have no other security measures that I can offer.

4. Do you agree with our proposals regarding standardisation of installation and commissioning, methods of communication and data models.

I agree and have no alternative to suggest.

5. Do you think that our proposals for monitoring and fault findings is suitable?

I agree that the proposals for monitoring and fault finding are suitable and have no alternatives to suggest.

Kind Regards

Diane

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