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The Renewable Energy Company Ltd (Ecotricity)
Feedback on the Use of Automatic Meter Readers for Biennial Meter
Verification

Dear Feed-in Tariff Manager,

Ecotricity is an independent renewable energy generator and supplier, with over 155,000 gas and electricity customers, 13, 385 Feed-in Tariff customers, 59 wind turbines and the country's first large scale solar park.

We have been offering FiTs to customers as a Voluntary Licensee since the inception of the scheme in 2010, and through the domestic RO scheme prior to FiTs. Although as a company we have not yet reached the customer number threshold to make participation in the FIT scheme compulsory, we see incentivising renewables as a positive measure in today's society, and fully support it.

The introduction of the use of Automatic Meter Readers (AMRs) in biennial meter verification is a step that Ecotricity fully supports. Although it would mean a fairly high initial expense, we see it as a necessary measure as the industry moves towards a fully integrated smart metering system. We believe that with suitable monitoring and verification checks, the use of AMRs should be risk-free, and will provide an early step in establishing industry trust in remote metering.

We offer our response to the consultation questions below.

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

We agree with the proposal to allow the use of AMR data for biennial meter verification. Many of Ecotricity's multi-site generators use AMRs, and we have found that the meter verification process for these sites is often the most complex and drawn-out. This is because AMRs are frequently used by multi site generators and the resident of the property is not the owner and named generator on the FiT scheme. The use of AMRs in the meter verification process would streamline this process and allow for more efficient management of the FiT scheme by suppliers.

- 2. 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 with the methods of verification and sample size proposed. Regular readings from third party data sources would provide the necessary levels of accuracy and the random site visits of 5% of AMR fitted installations would ensure that no fraudulent practices were taking place.

However, we suggest the addition of a photo, taken at installation, both to ensure against information transmission errors, and be a record of the meter serial number (MSN) and all relevant meter information. This is because some meter types have their MSNs on the back of the meter, which cannot be seen once installed, and can cause issues for the customer down the line.

- 3. 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 security measures proposed; however, we do feel that these requirements should be enforced at installation rather than at application to the FiT scheme. This is because as suppliers, we will not necessarily have the kind of knowledge necessary to assess the security requirements. We therefore suggest the following:

- That a list of acceptable AMR components be created so that we are able to confirm which types are eligible under the FiT scheme.
- That the security measures be part of the MCS process, carried out by accredited installers who hold the kind of knowledge required.

- 4. 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 with the proposals regarding the methods of communication and data model compliance.

We do not agree that the responsibility for the AMR security should lie with the supplier. As mentioned previously, we do not believe that suppliers will necessarily hold the relevant knowledge and skills to ensure that all security requirements have been met, and we suggest that this should lie within the MCS accreditation process. Therefore we suggest amending the MCS requirements for AMR installations, whilst allowing that the application to FiTs should remain unchanged, with all necessary checks having been carried out by the installer.

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

We agree that a base level of monitoring and fault finding should be in place before using AMR data, and that monitoring and checking readings should be the responsibility of the licensee.

6. What methods would you propose as alternatives to physically reading non-AMR meters?

We agree that physically reading non-AMR meters is expensive and time-consuming, and suggest allowing the consumer to send in a date-stamped photo of the meter, showing all the required information as an alternative. This should be subject to the following:

- Severe penalties if the installation is found to be fraudulent.
- Spot checks on a certain percentage of the customer base to discourage fraud.
- Physical reading checks on accounts which have had a certain number of out-of-tolerance readings in the year previous to the verification date.

Conclusion:

The introduction of the use of AMRs in biennial meter verification will make a marked difference in the way many of our multi-site generators are managed and should, over time, reduce the administrative burden of such accounts. Further to this, we see the use of AMRs as an integral step towards a fully automatic metering system for all customers, which we support as being more cost effective in the long run, and less disruptive to our customers. However, we do have concerns about the responsibility for all AMR security checks being placed on the supplier rather than the installer, and feel that this should be re-considered.

Ecotricity welcomes the opportunity to respond and hope you take our comments on board. We also welcome any further contact in response to this submission. Please contact Tecla Spiller on 01453 769391 or Tecla.Spiller@Ecotricity.co.uk.

Yours faithfully,



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