



Feed-in Tariff Compliance Manager
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Feed-in Tariffs Scheme: Use of automatic meter readers for biennial meter verification - Consultation on proposed changes to guidance

EDF Energy is one of the UK's largest energy companies with activities throughout the energy chain. Our interests include nuclear, coal and gas-fired electricity generation, renewables, and energy supply to end users. We have over five million electricity and gas customer accounts in the UK, including residential and business users.

In general we agree with the proposals made in this consultation. However, we believe that due to the limited numbers of advanced meter readers (AMRs) used for metering generation, the advantages to suppliers are likely to be limited.

Our detailed responses are set out in the attachment to this letter. Should you wish to discuss any of the issues raised in our response or have any queries, please contact John Mason on 01342 413838, or myself.

I confirm that this letter and its attachment may be published on Ofgem's website.

Yours sincerely,

A handwritten signature in blue ink that reads 'Paul Delamare'.

Paul Delamare
Head of Customers Policy and Regulation

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Attachment

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EDF Energy's response to your questions

Q1. 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. In general EDF Energy has no issue with the proposals set out. The three options proposed for verifying reads, including the ability to continue physical meter reads, should provide Licensees with sufficient flexibility to cover scenarios where data sourced directly from the meter service provider might not be appropriate.

We are not aware of significant amounts of advanced meter readers (AMR) used for the purpose of measuring generation of energy under the Feed-in Tariff (FIT) scheme. We do not currently differentiate between AMR and other types of generation meters and therefore would continue to subject all meters to the biennial physical meter check.

We do have experience of a relatively small number of FIT eligible generators who use AMR for export purposes. For these generators the reading of data, physical check of a meter, and the need to ensure it is secure against fraud are already requirements within existing industry codes. Therefore, the advantage gained by these proposals will be limited.

Q2. Do you agree with the methods of verification and sample size we have proposed? If not, what would you propose and for what reason?

As stated above, we do not differentiate between AMR and other types of generation meters and therefore would continue to subject all meters to the biennial physical meter check. However, where suppliers do alter their practice on AMR reads a 5% sample check would seem reasonable in order to ensure against fraud.

Q3. 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

Yes, the security measures proposed seem reasonable and in line with the measures provided as standard by most meter service providers.

Q4. 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?

EDF Energy has no comment to make on this issue.

Q5. Do you think that our proposals for monitoring and fault findings are suitable? If not, what further guidance would you suggest?

Yes, we agree with the approach taken.

Q6. What methods would you propose as alternatives to physically reading non-AMR meters?

EDF Energy has no comment to make on this issue.

**EDF Energy
February 2015**