Great Places Housing Group response to Ofgem consultation on the use of AMRs within FITs for biennial meter verification

Question 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.

Yes, I agree AMR data should be used for biennial meter verification. The purpose of the AMRs is to enable large generators to install a number of PV sites without the need to visit the properties regularly. The cost of accessing the properties for manual meter inspections far outweighs the cost risk of fraud taking place as demonstrated by the Ofgem sampling.

The greatest risk for AMR readings to be corrupted (purpose or accidental) is when the meter reads are submitted to the licensee which must be via an excel spreadsheet. Even then there is still a control mechanism in place and that is the tolerance levels as set by the licensee. This has proved to be a robust mechanism and where meter reads have been outside the tolerance levels the generator has had to demonstrate how/why the meter reading is outside the tolerance zone. This prevents a fraudulent meter read being submitted and successfully receiving FIT payment.

Question 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?

Overall yes, however I do have some comments

Method 1: 3.2 "the data should come direct from the meter service provider". This reduces the opportunity of fraudlent claims. The meter service provider is separate from the generator/FIT reciever therefore does not have a financial interest in the meter readings/FIT claim.

Method 2: 3.10 "Licensees are currently expected to conduct tolerance checks of submitted meter reads". In our experience our Licensee robustly implements tolerance checks of the submitted meter reads. The tolerance zone includes whether the meter reading is too low or too high outside the expected level. Where the meter reads fall outside the tolerance zone we, the generator, must provide significant evidence (including contractor confirmation/photographs) to demonstrate the reason for the meter reading falling outside the tolerance zone.

Method 3: This method is not valid for AMRs. AMR's were installed by generators at locations which are not easily accessible for example within domestic properties. At no stage over the course of our three year installation programme were we made aware of a need for meter inspections. As a generator we would be happy to assist the meter inspectors to gain access to the properties but this would be exceptionally time and cost ineffective for the licensee compared to the other options. The remote meters were purposely located in hard to access areas (unboarded lofts) to avoid the risk of the meters being damaged.

Sample numbers: Based on the 300,000 manual inspections to date less than 0.01% were found to be inaccurate of which all were found to be accidentally not purposely corrupted. This indicates the risk of fraudlent claims is exceptionally small and the costs of 5% manual meter reads of AMRs is excessive and far outweighs the risk of corruption/fraudlence.

I would propose a 1% manual sampling rate with an annual review which would seek to increase or decrease the number of inspections subject to the findings.

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

I disagree with the security measures.

For social landlords the physical security is that the meters are located in lofts of residential housing. There is no incentive for the occupant to physically tamper with the meters as they benefit from the generated electricity not the FIT payments. There is no benefit to the generator in tampering with the meter as any meter reads outside the tolereance zones will be flagged and failed by the licensee.

In our case our meters are not sealed composite units. The tamper proof seal would be a cable tie. This could easily be replaced should fraudlent activity take place and therefore does not add value as a security measure.

An alternative security measure to those prescribed is that remote meters have an internal log which registers every time the front face is removed. This could be checked at the request of the licensee if the meter reads exceed the tolerance zones. I attach an example of the 'event log' from one of our meters as evidence. This demonstrates the meter has not been tampered with post installation. The 'event log' can be provided directly by the service provider and therefore can not be manipulated by the FIT generator/receiver. Using the 'event log' is an adequate and low cost security measure.

Question four: Do you agree with our proposal regarding standardisation of installation and commission, methods of communication and data models? If not, what alternatives would you suggest?

Yes – the MCS and DMMS/COSEM are sufficient for installations, commission, communication and data.

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

Yes – these are suitable. We have found the licensee to be quick to pick up sites that are outside the predicted levels (tolerance zones). The tolerance zones are always checked by the licensee before the FIT claims are accepted.

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

I would recommend that future PV installations are required to be fitted with AMR meters. This will have a small increase in costs for the generator at point of installation but will remove the long term burden of manual meter readings. This solution can not be retrospectively fitted due to the costs of replacing meters on such a large scale.