

Hi Chris,

Please find our responses to the consultation questions listed below:

Question One: 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 that AMR data should be suitable for biennial meter verification. We have found that most of the sites that we manage that have the remote reading facility are for generators that are Housing Associations or generators that have a large number of installations at a variety of addresses. By allowing AMR verification of their meters we believe this will make the running of the scheme easier for these customers and remove the need for them to have to access a multitude of properties every 2 years. We would comment that carrying out a physical visit to site is the most definitive way of checking a metering system and its reading, but add that we have not had any of our AMR sites provide different figures on the remote data when compared to the physical checks, so it would seem that AMR data can be trusted.

On top of this it could be the case that the use of AMR data would reduce the number of problems that suppliers and generators have had with meters located in inaccessible locations. If AMR reads can be taken from meters that meter readers or third party agents can't physically verify, it will cut down the number of failed visits and bespoke appointments that suppliers have to book in order to meet the required level of two-yearly checks. This would not solve the issue of meters being installed in the wrong place, but it would certainly help reduce the problems Inaccessibility causes.

One question we have about the potential use of AMR readings is brought up in point 2.3 in the consultation though. In this point it says *"It is our opinion that meters using impulse loggers, calibration LED pickups and other such sensors, which do not have intrinsically linked components, do not reach the required level of accuracy to provide accurate sources of data."* How do we prove that existing meters installed for our generators meet these required standards? Will there be a list of approved meters or approved AMR metering and data collection systems that will be published as a result of this change to the FiT guidance? We would not want to advise our generators that they have AMR meters installed when they don't have the correct level of accuracy. We would also be keen to consider the option of having the correct type of meter/AMR system installed for all our generators if possible to make all our generators AMR compliant and avoid any unnecessary costs for physical checks, such as the disruption the fitment on non-regulated meters causes our operation. FiT generation meters are not installed to the same standards as their industry counterparts.

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 that the use of historical data and physical checks would be suitable methods for verifying read data as this is similar to the current non-AMR process for read verification that we already do. We are also happy for generators to be audited by signing a declaration to confirm that their AMR settings have not changed and we are happy that a 5% sample of AMR meters is a suitable number to verify accurate AMR processes for licensees.

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 are happy with the security measures proposed.

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 with the proposals in question 4 but would mention that the MCS accreditation process may need to be more tightly monitored by MCS and RECC to ensure that any additional AMR requirements are adhered to by installers. If changes are being made to the standardisation of installations it might be worth reiterating the need for meters to be installed in an accessible position and to the same high standards as expected on the supply side of the business. Our experience of trying to read meters in lofts, without floorboards have posed health and safety concerns and refusal by some operatives to carry out the check. We would not be allowed to install an import meter in such a place and we feel stricter regulation is required.

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

If the monitoring of systems and finding faults is something we as a licensee are going to be audited on then it would be sensible to have a best practice guidance in place at least so that all licensees know how we are expected to deal with faulty systems and errors in data that we find.

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

We would propose using photographic evidence as a means of checking meters. For non-AMR meters I think that the current meter verification system costs suppliers significantly both in time and money. If we are looking to reduce costs and time spent managing the scheme, is there not an option of simply reducing the number of checks required for physical meter verification? Is there any scope for making the checks further apart, i.e. longer than 2 years apart? From our point of view, we have yet to find any problems with the two-yearly checks we have carried out and it seems that having to go back out 24 months after the first visit seems a little extreme for sites where there is no problem.

Maybe we can even use a combination of the two and have the initial two-yearly check be a physical site visit and then after that have photos taken on a biennial basis interchanged with further site visits.

Please let me know if you need any further information.

Best Wishes,

Edd Horne

green energy