To answer the questions:

we are an installer of PV systems and also own and operate 21 of our own which use AMR meters which are monitored by Passiv systems. We have also recently started trialling a commercial amr system from ORSIS.

Question One: Yes the use of amr data should be allowed for verification. The 2 systems we use send an actual reading from the meter itself. As such the reading that is received is like looking at the meter itself. I believe meters from people like Elster and ASL which have integrated GSM units or data accumulators which link via data cable work in the same way and as such are incapable of sending incorrect information.

Question 2: Yes i agree that the proposals seem sensible.

Question 3: Yes I agree

Question 4 Yes I agree

Question 5 yes I agree

Question 6: We don't see customers making deliberate errors - but we have seen some older customers sending ready with a decimal in the wrong place. As such I think most installations could be verified with the use of a photograph from the generator showing the meter reading and serial number. Te read will be checked by the Fit licensee against expected generation so any major attempts to defraud would still be highlighted. Some customers may not have the facility to do digital photos but most will - which will reduce the meter reading costs.

Michael Stephenson. Director.