In response to your consultation we support the proposal to allow AMR for biennial readings, subject to appropriate checks. However the need for DLMS and particular levels of password protection seems too technology / process prescriptive. It should be sufficient to require the systems to be accurate and secure, and leave it to licencees to make random/sense checks as appropriate.

Fraud is an issue that will still need checking for with at least one visit even with DLMS and passwords, so I do not see how they help.

Kind regards

James Page
Head of Engineering