Hi Chris,

Thanks for the invitation to the meeting, it was good to have the opportunity to participate and to meet up.

Please find below my answers to the questions in the consultation document, if you have any questions just get in touch.

Best Regards,
John Lindley

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Comments from John Lindley of behalf of Meter Manager Ltd, meter distributors and operators of the MeterOnline metering service.

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

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.

Answer One: Yes, where the automatically read meter is of an approved type (MID approved) with integrated communications allowing remote communication of the actual readings because:-

1. The type of AMR meter usually used as a generation meter has already been approved for fiscal use in its original application, as a supply meter for billing purposes, so would appear to be proved as trustworthy and accurate.
2. Readings from existing AMR has proved trustworthy by passing meter verification visits and reading plausibility checks.

[Yes, providing the meter is MID approved and has an intrinsically linked communication capability (Pulse counters and similar being excluded)]

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?

Answer two: Yes,

1. (3.18) In general a small sample would appear to be sufficient.
2. (3.3) As a metering service provider it is possible for us to directly provide data for verification via a login or emailed report. If any specific standardised procedure was proposed the practicalities and any costs would need to be discussed with the licensee and those involved, but in general terms there are no major obstacles to

providing the data. **[Yes, readings can potentially be provided directly to licensees for verification]**

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

Answer three: Yes in general but..

1. (4.3) A requirement for 3 levels of password may be more appropriate than 4 levels, generally the "4th level" will be for the manufacturer only and may require removal of seals and a connection to be made inside the meter to achieve this. This "level", which is unavailable to the user of the meter, is the only level where the meter readings may be changed. So often there are only three levels available to the user of the equipment. **[No, Would suggest 3 Levels (with transformer ratios and password changes at level 3)]**

2. (4.8)The main cover of a MID approved meter is fitted with seals by the manufacturer, the screws securing the terminal cover and communication module often may not have seals fitted by the installer. The reason being that there is no straightforward possibility of fraud by tampering. Tampering with the meter terminals on a generation meter is not an easy source of fraud, short circuiting them would only reduce the FIT claim. Removing the communications module or SIM card would result in an interruption of remote readings, but the readings could not be changed. However the theft of the SIM card is a potential risk to the meter owner, however SIMs would usually be protected by limiting their functionality at a network level, rendering them unusable in a mobile phone. **[No - Would suggest manufacturers seals on main body of the meter as essential (I suspect this may be embodied in the MID approval already) – however seals on terminal cover and communications module not essential but "best practice"]**

3. (related to 4.7) In addition **[Would suggest - recommending that when a AMR meter is read, the serial number of the meter should also be read to ensure that the meter reading can be associated with the correct meter]**

4. (4.7) **[Would suggest – minimum record should be 3 items:- Meter Serial Number, SIM card number (i.e. the ICCID, this is the long number printed on the SIM card, not the CTN "phone number"), Brief address and postcode (e.g. 12 Douglas Ave BL8 7ZT)]** If the communication module has its own serial number this could be recorded, but as an option (some meters do not have this number in any case, where the GSM modem unit is built-in of the meter itself).

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?

Answer four: Yes in general but...

1. (5.7) **No** to primary and secondary communications methods required from the meter, the equipment available does not generally have this capability**. [No - Would**

suggest that the secondary backup should be that the meter must have a display that may be read manually]

2. (5.8) **No** to only DLMS/COSEM data transmission protocol, not all models of AMRs use this (e.g. Elster uses a different protocol on many models proved to read securely and reliably by Meter Operators for billing, in addition to use as generation AMRs), also new protocols will emerge with new products and development of Smart Meters which will ultimately also be used as AMRs for FIT. The data model is usually specific to the equipment manufacturer. **[No - Would suggest only nonspecific e.g. "The data model for the transmitted data should be designed to ensure accurate and correct data transmission"]**

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

Answer five: Yes
(6.3) **[Would also suggest – Adding a "best practice" note, that daily or weekly meter reads are advantageous because system faults can be found in a timely manner and available readings will be as close as possible to the required reading date for the FIT claim]**

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

Answer six: An AMR meter is relatively low cost (in the region of £100), has the same British Standard connections as the manually read meter and is relatively straightforward to fit. **Therefore if an economic case can be made for changing the meter, the solution would be to change to AMR.**

John Lindley
MeterOnline