# ORSIS (UK) Limited

In response to the Consultation on the use of AMRs within FITs for biennial meter verification document, please find detailed below the responses from Orsis (UK) Limited.

**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.**

- Orsis (UK) Limited supports the proposal set out in the Consultation document on the use of AMR's within FITs for biennial meter verification.
- Orsis has provided AMR services to customers through Housing Associations, Local Councils and MCS accredited installers since 2011.
- Orsis standard solution provides HH register read from Ofgem approved meters as well as MID approved meters. Orsis (UK) operate as a standard the following in respect of metering data:
  - All meters utilised are Ofgem approved.
  - 30 minute profile data read as standard from meter registers.
  - Greater data granularity can be obtained for investigative purposes by changing the meter read rate remotely removing the need to attend site.
  - All data available on customer portal.
  - Historical data readily available for meter reconciliation.
  - Maintenance reports issued on a weekly basis for issues detected with any metering installation including non-generation detection.
  - Having data from meters held remotely also allows for the potential for benchmarking of installations.
- Having all the data held remotely from the physical meters also removes the issues of access to sites for obtaining meter reads especially on Rent a Roof, Housing Association and general landlord held properties.
- Orsis current operational model also allows for automated FIT submission and Load Factor Failures dealing directly with the FIT licensee.

**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?**

- Orsis (UK) Limited agrees with the methods of verification and sample size proposed.
- Orsis (UK) Limited supports and promotes the rollout of AMR for all FIT generation scheme participants regardless of generation type and it is our view this should be for 100% of installations. This would ensure unquestionable protection of revenue for not only the generator but also for the tax payer.
- Point 3.11 Orsis have procedures in place in the current working model that caters for this situation and liaise directly with the FIT licensee in such cases.
- Point 3.17 Due to the use of Ofgem approved meters together with 30 minute data profiles and the recording of historical data, systems utilized by Orsis have the ability to detect irregularities in any generation. This includes profiles graphs and site by site comparisons ensuring comparable generation for like for like installations.
- As a result of all the above and with Orsis having automated FIT to the licensee without the generator being involved in the settlement process, Orsis believe there are adequate checks and balances in place to detect any fraudulent activity. The use of the historical data can also be used as proof in any such cases.
- To date, Orsis have encountered no occurrences of fraudulent activity in any Feed-in-Tariff installations.

**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.**

- Orsis (UK) Limited agrees with the proposed security measures.
- All installations should support four levels of security with the first level being the factory calibration with three further levels of security associated with programming of the meter.
- All meters should have industry standard seals applied to prevent tampering.

ORSIS (UK) Limited

- Orsis (UK) have already implemented the sealing of the communications module onto the physical meter to prevent access to the communications module.
- Orsis (UK) have complete component identification for all component identification and due to the integration of the communications module with the physical meter, it is possible to replace the communications device without the requirement to replace the physical meter. This results is data continuity from the original meter.
- Where physical meters need to be replaced, it is currently the practice this can only be carried out by an MCS accredited installer.

**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?**

- Orsis (UK) Limited agrees with the proposal to standardise the processes for the installation and commissioning together with the communication methods and data models. That said, some degree of flexibility should be allowed for individual systems.
- To support the above statement, Orsis (UK) already has a set process in place that ensure meters are registered, commissioned and communicate.
- Orsis (UK) hold a complete asset register of all AMR components installed for any given installation.
- All data is transferred from meter to PV Portal front end using encrypted systems over GPRS networks. All data is transferred automatically without the need for any intervention in the process.
- Orsis (UK) utilise equipment for installations that support DLMS for data interchange, however, Orsis only subscribe to a subset of the COSEM standard for the data layer. Orsis would propose a transition period for meters that do not fully support the complete DLMS/COSEM standard.

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

- Orsis (UK) Limited agrees with proposals for monitoring and fault finding are suitable.
- Current operational procedure for Orsis installed AMR meters include:
  - Half hourly data as a default
  - MID approved meters utilized in all installations
  - Meter registers are retrieved and used for all installations
  - Data retrieved on a 12 hour cycle as default but Orsis have the ability to adjust the communications for increased data latency and frequency.
  - All data presented on a web portal for acces by Investor, Landlord and tenants. This includes the ability to obtain physical meter readings.
  - Orsis (UK) provide the facility for customers to enable Orsis (UK) to automatically submit meter readings to the FIT licensee removing the requirement for the Investors, Landlords or Tenants to submit readings. These readings are submitted automatically at the end of each FIT period.
  - Orsis (UK) provide weekly reports to clients indicating where there could be a potential issue with any FIT accredited installation.
  - Orsis (UK) have procedures in place for the processing of queries in regard to generation that falls outside of set tolerances to provide revenue protection on behalf of its customers. This includes:
    - Providing current meter readings from meter registers
    - Providing historical profile data to back up generation queries

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

- Orsis (UK) believe the only solution in terms of cost and impact is to have AMR meters in place but as a result of this there would also be annual data charges. These charges would far outweigh the cost of physically reading meters.

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- As a result of having AMR meters installed, historical data becomes available as does the potential for greater data latency that could be used for investigative purposes.