

Chris Wood
FIT Compliance Manager
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London
SW1P 3GE

16 February 2015

Dear Chris,

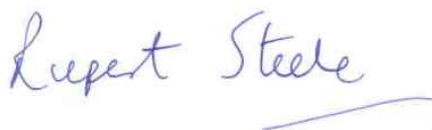
Feed-in Tariffs Scheme: Use of automatic meter readers for biennial meter verification - consultation on proposed changes to guidance

Thank you for the opportunity to respond to the above consultation. Whilst we do not currently have any FIT installations with generation or export metering that uses AMR remote reading functionality, we are supportive of the proposals outlined in your consultation.

We understand the issues identified by some FIT Licensees on the difficulties in obtaining a 2-year meter read verification, and see no reasonable argument as to why AMR capabilities cannot be used to obtain and verify generation reads. However, we would like some clarity on Ofgem's expectations on FIT Licensees with regard to the level of assurance that would be required that AMR meters have been commissioned to an appropriate standard.

I have provided a response to your consultation questions in Annex 1 below, but should you require any further information, please feel free to contact Gareth Williams (0141 568 3930) in the first instance.

Yours sincerely,



Rupert Steele
Director of Regulation

**FEED-IN TARIFFS SCHEME: USE OF AUTOMATIC METER READERS FOR BIENNIAL METER VERIFICATION - CONSULTATION ON PROPOSED CHANGES TO GUIDANCE
SCOTTISHPOWER RESPONSE**

Question 1: Do you agree with our proposal to allow the use of AMR data for biennial meter verification? Please provide evidence to support your answer.

Yes, we have no objection to AMR data being used for biennial meter read verification, where practicable.

Question 2: 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 are broadly in agreement with the methods of verification, but would need to enter into agreements with third party meter service providers in order to obtain independent meter reads. We would encourage Ofgem to make it clear that Generators should ensure that their third party meter service providers co-operate with any appropriate requests for data from the FIT Licensee.

We are comfortable that carrying out a physical visit on a random sample of 5% of a FIT Licensee's generation AMR portfolio would act as a useful fraud prevention tool.

Question 3: 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 feel that the security measures proposed are reasonable.

Question 4: 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 are comfortable that Ofgem is not proposing to introduce standardisation for the installation or commissioning of AMRs beyond that already required for all FIT installations. However, we would like some further clarity on what Ofgem would consider appropriate for Licensees to do in order to "ensure that AMRs have been commissioned in such a way as to allay any fears regarding accuracy of data".

We agree that it would not be appropriate to specify the means of communication between an AMR meter and the generator/meter service provider.

We are supportive of Ofgem's proposal that all AMRs comply with the DLMS/COSEM standard, which should provide assurances that the AMR is able to transmit data accurately and correctly. It would be helpful if a condition of accreditation was the generator supplying evidence of this compliance to the FIT Licensee.

Question 5: Do you think that our proposals for monitoring and fault findings are suitable? If not, what further guidance would you suggest?

We believe that the current robust monitoring of all submitted FIT generation meter reads would ensure accuracy of data and assist in the remote detection of potential faults. It would be our intention to follow up any anomalous readings via our operational escalation process.

Question 6: what methods would you propose as alternatives to physically reading non-AMR meters?

We would encourage Ofgem to carry out some analysis on the current 2 year meter read process to determine if it would be appropriate for FIT Licensees to carry out a sample check of meters, as opposed to requiring verification on the full FIT meter base.

If appropriate, Licensees could randomly check an agreed sample of generators who would qualify for the biannual verification check. This could be carried out by a physical visit, or potentially requesting the generator provides us with photographic evidence of their meter reading. Where the generator is unable or unwilling to meet this request, we would follow up via our operational escalation process.

ScottishPower
February 2015