Feed-in Tariff Compliance Manager
Ofgem
9 Millbank
London

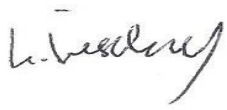
SW1P 3GE

11 February 2015

Dear Sir/Madam,

Please find below Solcap Energys' response to your consultation on proposed changes to guidance, **Use of automatic meter readers for biennial meter verification**.

Yours Sincerely,



Kian Lissenburg

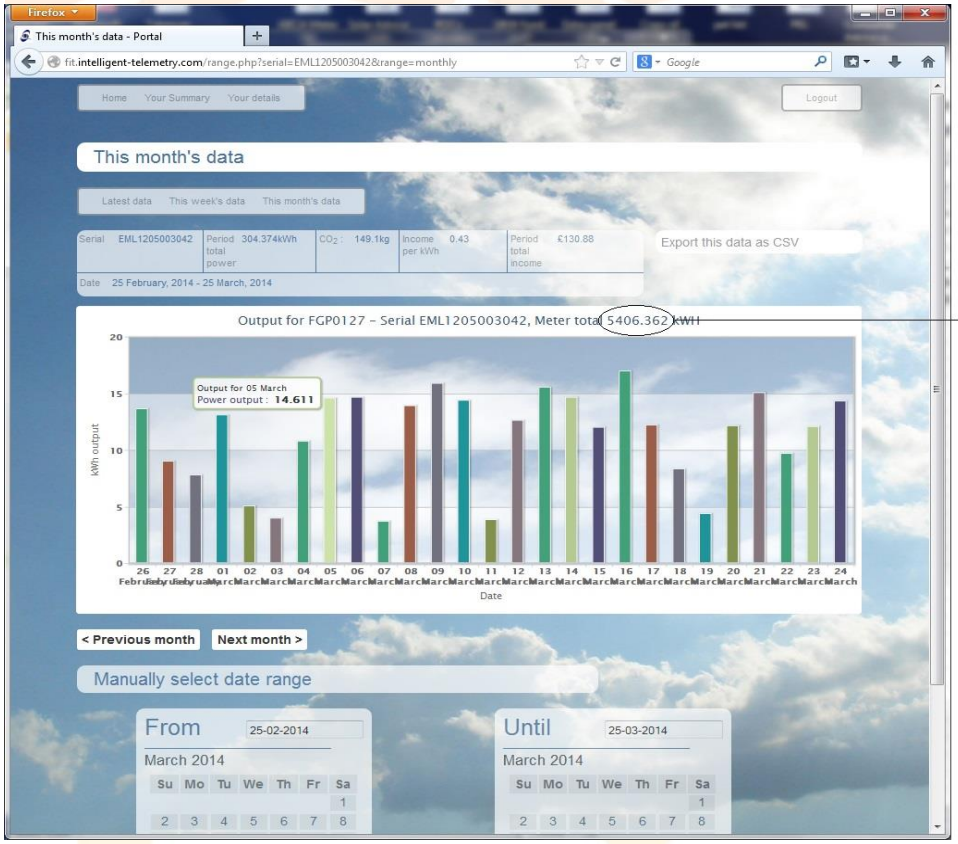
Installation Manager

Solcap Energy

Use of automatic meter readers for biennial meter verification

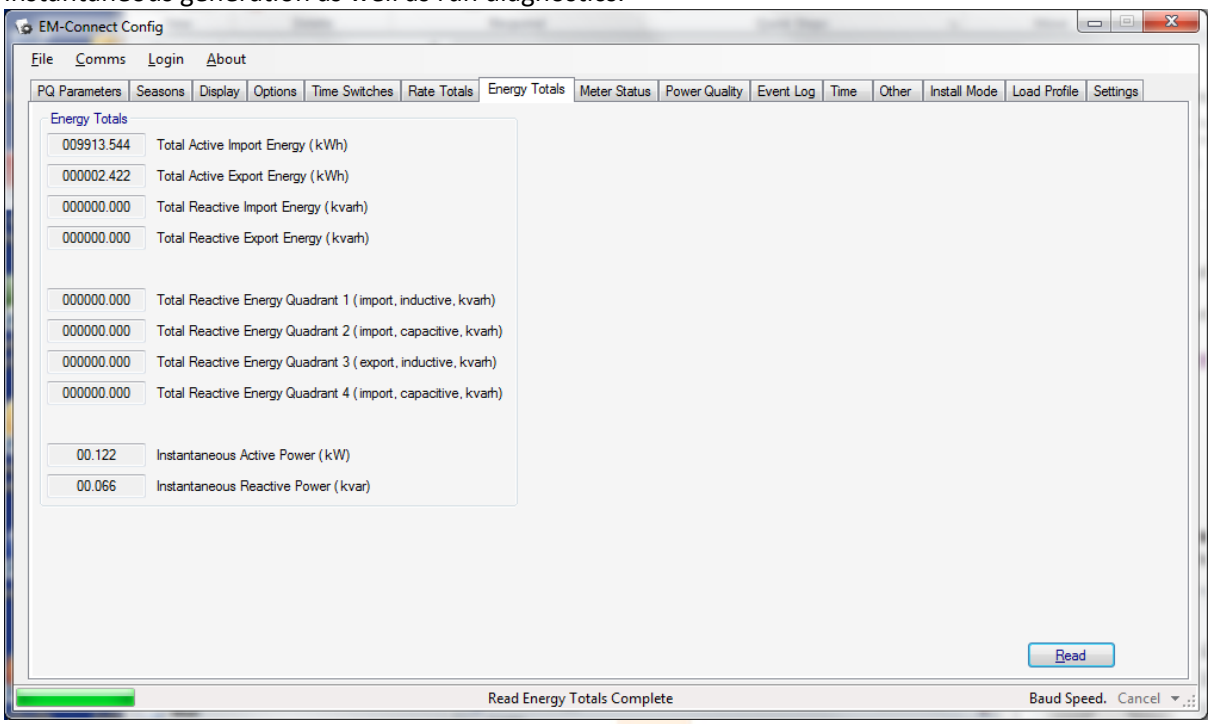
Question 1: Do you agree with our proposal to allow the use of AMR data for biennial meter verification? Please provide evidence to support your answer.

We, Solcap Energy (Solar Capital Limited), agree with the use of AMR data for biennial meter verification.
We have found that remotely read meters are very accurate and allow us real time access to a site for both meter reading and remote diagnostic purposes.



The above is an example of the data we have provided in the past to Good Energy, our FIT licencee, it shows total generation to date as well as back dated daily readings which can be extended to cover any required period. Any anomalous data is picked up on very quickly as readings are obtained daily.

In addition to the historical data we also have the ability to connect to our meters in real time to pull instantaneous generation as well as run diagnostics.



As you can see from the above screenshot we have total generation and instantaneous generation recorded for the meter at the time of the reading. We are also able to obtain grid voltage information and other diagnostic data to quickly identify any suspected issues remotely before needing to go on site to rectify them.

Question 2: Do you agree with the methods of verification and sample size we have proposed? If not, what would youi propose and for what reason?

Solcap Energy agrees with the proposed methods of verification, we are happy to give access to our metering accounts and have in fact suggested this as a possible option to our FIT Licencee in the past.

We have no problems with the proposed biannual auditing, we already update our FIT Licencee whenever a replacement occurs with a meter as soon as it takes place.

We have a number of meters in loft spaces within portfolios we manage, meters were often installed in these locations to ensure signal for the remote monitoring.
As a result customers have been upset by repeated visits to read meters that have not actually gone ahead.
We would be happy to accommodate visits to a number of our sites but we feel that 5% is excessive given you have found no evidence of fraud from 300,000 visits. We instead suggest that the 5% visits

should only be applied to new installations as if fraud is to occur it is most likely to be at the point of installation and not done retrospectively.
We would also ask that we be given good notice and a schedule of proposed visit sites well in advance of the visits taking place.
What we have found is that we were not informed when visits would take place and so customers have called us up confused and sometimes angry that someone has turned up unannounced.
A large percentage of our customers are elderly and vulnerable so unannounced visits cause them undue stress and worry.
In regards to meters in loft spaces that may fall under a proposed visit we would ask that Licencees ensure they are able to read these meters so they do not make wasted trips as this has been another source of complaint by our customers. They must also ensure that they carry ID as many employees of our FIT Licencee that have been doing these visits have not and this is another point of unease and should not be standard practice.
We are happy to work with our FIT Licencee if they have issues over any particular sites as long as they give us adequate notice.

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 propsal.

Solcap Energy agrees with the security measures proposed. All of the meters we use are MID approved.
The meters we use have sealed base units but detachable modems so there is no risk of reading the wrong meter if a modem or SIM is swapped as it will pull its reading against the base unit meter serial number. The only details that will get updated would be to inform our meter provider that a new modem had been installed on a meter to ensure that the modem was added to the read list.

Question 4: Do you agree with our proposals regarding standardisaion of installation and commissioning, methods of communication and data models? If not, what alternatives would you suggest?

Solcap Energy agrees with your propsals regarding standardisation, we feel that the current quality of installation methodology is high and does not need review.
The metering we use all conforms to the DLMS/COSEM standard so we have no issue with this.
In terms of method of communication, all of our meters use GSM modems with multi-network SIMS so that if one network goes offline they will roam onto the next strongest and continue to send data. We have seen a high level of resilience with our meter communications as a result of this.

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

Solcap Energy feels that your proposals are suitable.
We currently have comparisons with PVGIS Climate-SAF data against all of our portfolio which tracks sites to ensure that generation remains within predicted levels.

As mentioned in question 1, we also have a lot of remote diagnostics we are able to run should we ever feel that a site is giving unusual readings and these are always investigated and rectified as soon as physically possible.

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

Solcap Energy does not have any non-AMR meters in our portfolios, however, it should be possible to look at risk factors against certain generators to gauge how likely they are to submit incorrect or fraudulent readings. One method for this would be the use of the already in place tolerance checking on readings submitted as it is unlikely that fraud would be occuring if these are consistently within predicted ranges and an installation at that site has been confirmed.
Any generator where readings are suspect could be subjected to random spot checks on a percentage of their portfolio so that they would not have an opportunity to arrange a cover up on any particular site.