

Dear Sir/Madam

Please see below Staffordshire Housing Associations response to your Consultation Questions regarding the fitting of AMR's

Q1) We agree with the proposal of using AMR Meters for meter verification. We believe that this would make the process of reading the meters much easier for all parties involved. Installing an AMR would save time and money, as having someone physically reading meters is more time consuming and more expensive. By allowing meters to be read remotely they do not have to be installed in easy to read areas allowing the meters to be fitted in locations where they can not be tampered with by tenants. We have already fitted 380 AMR meters in loft spaces for this reason. This has proved to be effective and the only time we visit is if the meter is not signalling properly, at which point we send out a contractor to do a physical check of the system.

Q2) We agree with all the verification methods suggested (**1.** use of data from meter service providers **2.** Auditing of generator systems **3.** physical readings **but** only on the suggested sample size of AMR's) We also agree with the suggested sample size (5% of all AMR meters) **however** licensees representatives who are responsible for taking these readings should be expected to provide sufficient means to be able to look in loft spaces in order to take the readings if meters have been fitted in these areas in good faith to prevent meters being tampered with.

Q3) Regarding the security measures being proposed, the existing AMR meters that we have fitted are completely sealed composite units and can not be tampered with unless the meter is destroyed. The fitting of an extra physical tamper proof seal would be pointless on this type of meter. However, we understand that it is your proposal only to fit this type of seal to units which are not already sealed units and as such we agree with your proposal. Its worth noting at this stage that should we be required to move our existing meters from the roof space for any reason, this would be at significant cost and would involve having to gain access to tenanted properties which is always a very difficult and time consuming process. It is hard enough to get into properties to do gas safety and electrical checks let alone to do work to these meters which generally, tenants will not see as important.

With regard to the four level pass word system, our understanding is that this is on the reporting side of things rather than the meters themselves. As long as the system that is being proposed can be adapted so that our existing meters/reporting system complies with your requirements, then we would not have an issue with this. If it proves that the system that you are proposing means that our existing meters become obsolete, we feel this would be most unfair. We would of course be happy for any new installation to comply with any revised standards.

Q4) We feel that the original specification is suitable in most cases, however any changes that you feel necessary to help ensure standardisation of instillation and commissioning, etc. should only apply to new installations rather than to equipment already fitted.

Q5) Again we feel that the original specification/system is suitable and appears to be working adequately. However any changes that you feel necessary should only apply to new installations rather than to equipment already fitted.

Q6) A possible alternative to reading the non-AMR meters could be to extend the display of the meter with a pulse display to a location where it could be read easily. Although this would still not remove the fact that a person would physically have to read something.

I would be grateful if you could confirm receipt of this feedback

Regards

Marshall Fear

Marshall Fear
Head of Regeneration & Development
Staffordshire Housing Association