

Stockport Homes Ltd

Joe Keating Environmental & Energy Manager

Joe.keating@stockporthomes.org

0161 218 1363

07891949487

Introduction:

Stockport Homes are an Arm's Length Management Organisation (ALMO) which is a wholly-owned subsidiary of Stockport Metropolitan Borough Council (SMBC). We management 11,500 socially rented homes on behalf of the council; employ over 500 staff and have an annual turnover of £46m.

During 2011/12 Stockport Homes invested £10m in solar PV on the domestic housing stock and fitted 1,924 sub 4kWp systems. The solar PV scheme is monitored remotely using the Orsis Portal (<http://orsis.co.uk/>) and Good Energy (<http://www.goodenergy.co.uk/switch?gclid=CKCVnOHWyMMCFWfJtAoddHgATw>) are the registered F.I.T. administrator.

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.

A1: Yes I agree and AMR data use for meter validation seems a very reasonable and sensible solution as opposed to insisting every meter is visited every two years.

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?

A2: I have no objection with Licensees having access to the remote reading AMR website portal; having their own "read only" access to directly download meter reading data. I also have no objection to any requests for site visit validation at a rate of 5% every two years provided the costs associated to this are not passed to the generator (owner of FiT Income).



<http://www.sunrise-portal.com/stockport/>

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

A3:

- *The generation meters are fitted in the loft space of each house with floor decking leading to each meter point and a light fitted in the loft making them easily accessible.*

- *The tenants living in those properties only benefit from the 'free' electricity produced by the PV system and have no claim over the F.I.T. I would therefore suggest there is little to no risk associated to meter tampering from that point of view as there is no drive or reward.*
- *Stockport Homes are a reputable business which is wholly owned by the Local Authority. It is just unrealistic to suggest a company of this stature and status would de-fraud the F.I.T. scheme by deliberately changing data to benefit financially. Furthermore clear evidence can be provided by Good Energy on all the historic F.I.T. claims which have taken place over the past three years and this data can be used to benchmark against new data submissions. Finally to allow random audits every two years on samples of the portfolio would also be a 'safety net' to ensure data is accurate, true and honest.*
- *Stockport uses the Elster A100C meter (<http://www.elstermetering.co.uk/en/2068.html>) and attached documentation.*
- *Suggested re-wording to point 4.8*
 - *4.8. Not all AMRs are sealed composite units **or fitted with anti-tamper sensors & logging capability** so, to reduce the risk of tampering, we propose that all AMR fitted installations, which are not composite sealed units **or fitted with anti-tamper sensors & logging capability** should have tamper proof seals in place. These tamper proof seals should mean that unauthorised parties will not be able to affect the operation of the meter in anyway.*

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?

A4: I would suggest that the requirement for both primary & secondary means of communication be applied where it is clear that the primary form of communication is proven to be unreliable.

Forcing the use of secondary would have a significant cost burden to our organisation.

The current coverage of the Geographic area we cover maintains a 99.9% consistent "up time" using EE & Vodafone networks as the mobile data carrier. Perhaps a secondary communications could be suggested when a "down time" or failure rate of >10% is encountered.

Also, we would suggest that as well as DLMS/COSEM compliance, that AMR's fully comply with IEC 62056. This would enable greater choice of interchangeable units – driving costs down in the terms of choice of maintenance replacements over the life of the systems.

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

A5: Yes, this seems a very reasonable solution.

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

A6: In terms of other solutions to different methodologies to physical reads on non-AMR installs; in this day and age of technology I would suggest most people have access to mobile phones with cameras and/or internet. The potential to send over a photo once every two years seems reasonable. Maybe sample checks could be performed. Also would there be any scope for 'piggy backing' on the gas/electricity data collectors service?

1. Do you have any comments about the process adopted for this consultation?

A: I am concerned that while I manage a large PV portfolio on behalf of Stockport Homes I wasn't contacted as part of this consultation. I was passed the information by another housing provider so it was down to luck that I was able to have a say.

2. Do you have any comments about the overall tone and content of the report?

A: None.

3. Was the report easy to read and understand? Or could it have been better written?

A:None.

4. To what extent did the report make reasoned recommendations for improvement?

A: as a general rule I feel the overall contents are reasonable. I would however be very interested in the details that follow.

5. Please add any further comments.