Consultation on the use of AMRs within the FITs for biennial meter verification – Utilita Energy response

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

Utilita Energy agree with the proposal to allow the use of AMR data for biennial meter verification.

As stated within the consultation investigations into AMR metering has shown that the data transmitted through these meters are seen to be accurate and reliable. The requirement to read generation meters at least every 2 years is to ensure that payments made to generators accurately reflect the amount of electricity that has been generated/ exported and as a counter fraud measure, the use of AMR data is likely to be used by the licensee more than the required once in 2 year period, this ensures the licensee will have the most up to date and accurate information for the generation of the meter within a payment Q alongside the use of tolerance checks to compare against the read information as provided by the generator. Where the readings do not match or outside of the tolerance expected for the period, necessary steps can then be taken by the Licensee to ensure the information provided is correct.

The use of AMR readings mean licensee's do not need to make arrangements with the generators to facilitate access to the property to read the FIT/ Export meter. From a cost aspect this is more beneficial as does not require the use of an external meter reading company to attend and possibly re attend where access has not been granted on the first attempt. This is currently requried in order to satisfy the current requirement to 'take all reasonable steps to verify at least once every two years the generation meter readings and export meter readings provided by the FIT generator'.

The use of AMR reads also allows earlier recognition where a fault may have occurred with the meter. Where this occurs it allows the licensee and generator to take all reasonable steps to ensure the fault is resolved as quickly as possible, ensuring the time period for anomalous reads/ un recorded consumption is reduced. This is beneficial for both the generator and licensee.

Utilita currently have 27 FIT AMR meters in commission.

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?

Method 1 – Use of Data from meter service provider

We agree with this method of verification, Utilita currently have 27 AMR meters in commission under the same generator. We already have communications and processes set up to allow the sharing of this data between the service provider for the meter and ourselves. This data is securely passed to us on a Quarterly basis. This allows us to ensure the information provided is correct and runs in line with previous data and generator readings.

Method 2 – Auditing of Generator systems

We agree in part to method 2. If this method could be used alongside method 1, where for any reason we were unable to source data from the service provider, we could then align this with our current annual declaration process. It would still be seen as a more beneficial option to method 3 as it is quicker and more cost effective than arranging for physical meter reads to be taken.

Method 3 – Physical reading AMR's

We do not agree with continuing with this method, it is not cost effective for the generators or licensees.

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We agree with the 5% sample size proposed. This is especially advantageous to Utilita being that the small number of AMR meters we hold are placed under the same generator, meaning if any of the 5% sample of installations visited had any fault or tamper in place it would give us a basis to conduct an investigation into all other meters under said generator – meaning fraud in all places would be picked up. This may incur a cost for ourselves, but this outweighs instances where fraudulent activity is taking place – however unlikely this is to occur.

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

As there is minimal risk involved with hacking of meters, we do not see it economically viable to enhance cyber security on AMR metering. We are aware that all AMR meters currently on our portfolio have a tamper block seal. Where any tamper is notified to us, the FIT Team will work with our in house Revenue Protection Service team and will take the relevant actions to resolve the tamper issue.

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?

We agree with the proposals to continue accepting MCS accreditation proof that the installation has been installed in a correct manner.

We also agree with a primary and secondary means of communicating with the meter, the AMR meters we currently receive data from use GPRS as a primary means of communication where this fails a secondary communication can be used.

We agree with the proposal that all AMR meters comply with DLMS/ COSEM standards, as there is currently no definitive energy meter data models for AMR metering to comply with.

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

We agree with the proposals on monitoring and fault finding, the benefits of using AMR reads allows earlier recognition where a fault may have taken place with the meter, this allows both us as licensee and the generator to take all reasonable steps to resolve the issue as is in their interest as quickly as possible. In the case anomalous readings are provided by the generator we have sufficient processes in place to identify out of tolerance readings, by detecting this early through AMR readings this provides an added level of assurance that readings submitted to us as licensee are accurate and correct for the electricity generated and/ or exported.

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

We do not have any alternative options to physically reading non AMR meters. Although physically reading meters is an expensive and time consuming it can be required in order to confirm the information we are receiving from generators is correct and ascertain where we feel a site visit would still be required. However, we are open to any revisions that would allow no site visit but still ensure the accuracy of readings provided.

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