PARTY IMPACT ASSESSMENT RESPONSES

R0015 – REMOTE COMMUNICATION OBLIGATIONS FOR ELECTRICITY ADVANCED METERS

DATE ISSUED	28/02/2022
RESPONSE DEADLINE	21/03/2022

QUESTION	RESPONDENT DETAILS	RESPONSE
1. Do you have any comments on the proposed legal text solution?	**IMServ Europe** Metering Equipment Manager	The legal text suggests that there needs to be 'continuous remote access to electrical consumption data' however this does not allow for any failure rates at either installation, adoption or in life. There needs to be a time frame to allow a MEM to fix a faulty comms device. There is nothing in the wording about 'all reasonable steps' although this is mentioned as a reporting point. There will be reasons why a meter cannot communicate (location, customer access etc.) and this needs to be reflected in the wording and a tolerance should be included in the wording. As an example, 1% of our current MOP portfolio is classed as 'permanent hand held read' because the site is unable to have a working comms solution. A further 4% of the portfolio at any one time is subject to a comms fault.
	OVO Energy Metering Equipment Manager/Supplier	"Each electricity Metering Equipment Manager shall ensure that the Communications Equipment for each electricity Advanced Meter is active and maintained to provide continuous remote access to electricity consumption data (a)

		For Current Transformer Advanced Meters, no later than 28 February 2023; or (b) For Whole Current Advanced Meters, no later than 30 September 2024” 1. We believe that further definition is required on what “continuous remote access" means. Remote access will never be continuous for all sets of customers, eg due to comms provider issues. We believe that a set frequency may be required eg is continuous once a day, every 30 seconds? what is the exemption process if that meter does not have continuous comms? Does there need to be an identifier? If so, who would use it and why? How would that identifier be transferred and stored? 2. All reasonable steps needs to be defined as regards the obligations tied to “shall ensure” within the legal text. 3. Does the relationship between the DC and the MEM need to be more clearly defined, as the DC manages the reads/settlement. For example, if the read schedule is chosen by a domestic customer to be bi-annual, comms faults may not be recognised until the read window. 4. Obligations for NHH and HH have operational variances, we need clarity on which obligations fall where.
2. Do you have any comments on the proposed reporting solution?	**IMServ Europe** Metering Equipment Manager	Reporting should be sufficient to measure a MEM’s portfolio. However, there is no detail on how timing will be accounted for. For example, we could adopt a non-communicating meter and have an agreement with the supplier to exchange it, which may take several months to agree. We would suggest the need to categorise the reason for non-communication further eg MEM installed performance, MEM adopted performance, comms failures as a result of communication network etc.
	E.ON Supplier	Not enough information to impact assess this correctly however would want to know the following Who is producing the report

		what does it contain what actions are needed what happens is suppliers do nothing Who needs to create the report Are we expected to work the exceptions as part of data cleanse for MHHS Could this not be part of the programme of work for MHHS
	OVO Energy Metering Equipment Manager/Supplier	No feedback
3. As a Metering Equipment Manager, are the data items identified ones that you can readily provide? If not, please provide details	**IMServ Europe** Metering Equipment Manager	Yes
	OVO Energy Metering Equipment Manager/Supplier	No feedback
4. Do you support the intention to include clarification in the Metering Operations Schedule for losing MEMs to reconfigure the metering equipment to enable connectivity for the	**IMServ Europe** Metering Equipment Manager	Yes, although more detail in needed on exactly how this would work as it's not clear in the proposal.
	E.ON Supplier	Yes - this would benefit suppliers and make sure there is connection at all times and settlement is not impacted and customers get accurate bills based on polled reads
	OVO Energy	We are supportive of the intent, however there are nuances that need to be considered. For example, what would happen in a non-comms scenario. How do

gaining MEM on a Change of Agent?	Metering Equipment Manager/Supplier	gaining MEMs know whether meters have been reconfigured by the losing MEM. Is there a signifier? Do we need a signifier? Timescales will need to be considered as configuration lead times (eg if it needs to be configured on site).
5. Do you support the intention that this clarification should be included within the change of agent process steps?	**IMServ Europe** Metering Equipment Manager	Yes. This is the only way in which this would work.
	E.ON Supplier	yes - it is important that when an agent changes that the meter continues to communicate and that there is a clear process that needs to be followed where communication is lost There needs to be clear ownership of who is responsible for what, with timescales and implications if this doesn't happen in a timely way
	OVO Energy Metering Equipment Manager/Supplier	Yes
6. Would implementing this change incur any costs to your business? If so, please provide details.	**IMServ Europe** Metering Equipment Manager	Minimal cost in report development will be needed but it is too difficult to quantify at this stage. This would be influenced by frequency and granularity.
	OVO Energy Metering Equipment Manager/Supplier	Cost would be expensive, however, this is anecdotal, and we would need to perform further analysis to provide this. Expense calculations have taken place under P432, and we urge you to take note of this analysis. We would like to note that, before this modification is approved for implementation, we need to be sure that the cost of implementation does not outweigh the benefits.
	IMServ Europe	No

7. Do you identify any benefits to your business by implementing the proposed changes?	Metering Equipment Manager	
	OVO Energy Metering Equipment Manager/Supplier	Settlement performance would increase, but the benefit would probably not outweigh the cost of implementation. Ultimately, this would increase customer costs, without little to no benefit for them.
8. Considering any costs and benefits identified, do you believe this change should be made? Please provide details.	**IMServ Europe** Metering Equipment Manager	Yes. Improved industry reporting on portfolio performance will have an overall positive impact on the customer in terms of improved meter communication.
	OVO Energy Metering Equipment Manager/Supplier	Cost Benefit Analysis should lead the decision.
9. What lead time is required for your business to implement this change proposal if it is approved? Please provide details, including where the lead time relates to the provision of data items.	**IMServ Europe** Metering Equipment Manager	Small amount of report development will be required to automate data collection and reporting. This could be available within 1 month.
	E.ON Supplier	We would need to understand what our position is with how many meters we have that are not communicating and the actions we need to take to fix it before we can comment
10. Do you have any other comments	**IMServ Europe** Metering Equipment Manager	We would be happy to work with REC on designing and/or testing any proposed reporting solutions or processes.

relating to this change proposal?	**OVO Energy** Metering Equipment Manager/Supplier	Timeline is too aggressive. There are too many unknown variables. Getting everyone to agree could be complicated. Eg P272 is still under development.