

Title: **AMO response
Smart Metering Implementation Programme
– A Consultation on New Smart Energy Code
Content (Stage 4)**

Synopsis: To document the AMO response to DECC

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1. Introduction

1.1. Purpose

This document is the response to the consultation from DECC dated December 2013, seeking views on the Smart Metering Implementation Programme – A Consultation on the New Smart Energy Code Content (Stage 4) and consequential changes to licence conditions.

We have concentrated our response to Section 3 – Communications Hubs.

This response is not confidential.

1.2. Background

The Association of Meter Operators (AMO) is a trade association representing the interests of its members. There are twenty members¹ of the AMO including all of the active electricity Meter Operators and the largest gas Meter Asset Managers. Many of these companies also own significant quantities of metering assets, either directly or through associated companies.

The term Meter Operator is used throughout this document to include both the gas metering term Meter Asset Manager (MAM) and the electricity term Meter Operator.

1.3. Member Involvement

Many of the AMO members will undoubtedly provide their own response directly to DECC. This AMO response does not necessarily represent the agreed views of every member on each issue but has been prepared by the AMO Consultant on behalf of the AMO members based on views expressed through individual discussion, meetings and written comments provided by members.

The AMO membership is grateful for the on-going dialog with DECC, including participation for a number of years in the Smart Metering Implementation Programme and attendance at our recent AMO Smart Metering Forum meetings. The AMO membership would welcome the opportunity to provide any further clarification or discussion of any of the issues raised by this response.

¹ www.meteroperators.org.uk/members.php

2. Response to consultation questions

2.1. Chapter 3 – Communications Hubs

Question 1 - Do you agree with the requirement for the DCC to consult SEC Parties on future tranches of Communications Hub procurement?

Yes

Considerable experience of the installation process and reliability of the communication hubs will have been gained over the initial period of rollout and the users input to future tranches is essential to ensure appropriate improvements are made – for example sizing of the communication hubs.

Also there needs to be a joint decision process on the delivery of any HAN variants - multiple variant units or dual band units as this could have a significant effect on the cost and ease of forecasting/ordering.

Question 2 - Do you agree with the proposed approach to allow SEC Parties including MOPs) to forecast, order, take delivery and return uninstalled Communication hubs?

Yes.

The installation service required by suppliers may be different depending on their size and expertise in metering activities; therefore it is essential options are supported. Although it is anticipated that larger suppliers will continue to manage the communication hub stock allowing Meter Operators to handle a small volume of 'non-supplier' specific hubs will increase efficiencies for small suppliers and support a more effective emergency/maintenance activity. Such jobs could be 'slotted' into a day's schedule knowing that suitable equipment is in the engineers van.

The ability to offer smaller suppliers a 'bundled' service of procuring meter assets and providing an installation and maintenance activity will be compromised if the supplier has to undertake the ordering of hubs.

Question 3 – Do you agree with the proposed approach and legal drafting in relation to the development of the Communication Hub support materials?

Yes

Question 4 – Do you agree with the proposed approach and legal drafting in relation to forecasting of Communication Hubs?

Yes – subject to question 5

Question 5 – Do you agree that forecasts that are submitted from the tenth month before a delivery month should include the numbers of Device Models to be delivered in that month in each region and these should be subject to the specific tolerance thresholds?

We believe requesting forecast information by Communication Hub variants 10 months prior to deliver is extremely ambitious and highly likely to fail tolerance when the final order is placed.

10 months out Suppliers plans will reflect total expected installations but will not be robust enough at an individual customer level to allow premise interrogation of the DCC WAN availability matrix for the appropriate communication hub variant.

The matrix information will be updated which will potentially change the variant required after the forecast has been submitted. Although it is not anticipated to change significantly, a small change can have a disproportionate effect on small volume forecasts/orders placed by some suppliers and meter operators.

Question 6 – Do you agree with the proposed approach and legal drafting in relation to ordering of Communications Hubs?

Yes

Question 7 – Do you agree with the proposed approach and legal drafting in relation to delivery and handover of Communications Hubs?

Yes

Question 8 – Do you agree with the proposed approach and legal drafting in relation to installation and maintenance of Communication Hubs?

Yes

Question 9 – Do you agree with the proposed approach and legal drafting in relation to the removal and returns of Communication Hubs?

Yes

Question 10 – Do you agree there should be an obligation for the first installing supplier in a Dual Fuel premise to take all reasonable steps to install a Communication Hub that would work with both Smart Meters?

Yes – although would need to define 'reasonable'

Question 11 – Do you agree with the Government's proposals in relation to the process to determine the reasons for early returns of Communication Hubs?

Yes

Question 12 – Do you agree with the proposed approach and legal drafting in relation to the transitional requirements for Communication Hubs forecast and orders?

Yes – subject to the forecasting of variants (see question 5)

Question 13 – Do you agree with our proposed change to DCC licence to require the DCC to offer services to non-SEC Parties where required to do so under the SEC?

Yes

Question 14 – Do you agree with the proposed approach and legal drafting in relation to provision of Communication Hubs for testing?

Yes