

equipment for the commencement of the national smart meter roll-out.

Question 38	Do you think that regulatory obligations are needed to underpin a systematic approach to testing of HAN standards during the Foundation phase? Please explain your reasoning.
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Yes. Regulatory obligations relating to any testing helps to ensure continuity in the approach taken. In such circumstances this will enable industry to provide uniform evidence that leads to the final choices of the HAN standards. In addition this would provide a framework to make informed decisions relating to any potential 'upgrades', for example reviews of future technology standards not yet conceived. Without supporting regulation to ensure a systematic testing approach, rather than enabling informed choice of 'best suited' there could be an issue where the commercial powers of one particular technology standards associate body may become the deciding factor for 'choice'.

It is commonly believed that the earlier a defect is found the cheaper it is to fix it. For example, if a problem in the requirements is found only post-release, then it could cost 10–100 times more to fix than if it had already been found by the requirements review.

If Smart Metering is implemented into an immature market with few stable standards to provide controls, it is highly likely that problems will arise. A delay to the implementation of a system-wide test regime will allow latent problems to progress much further than they should, where remedial actions will add significant cost to the UK-wide solution.

We would recommend that a test [and/or accreditation] regime should be implemented and as a matter of urgency. This should be prepared alongside the development of the Technical Specification to ensure product consistency and increase the likelihood of delivering effective interoperability.

It should be noted that the date of 31 December 2014 to have recognised standards (mentioned in question 37) creates a potential issues with the current industry milestones. One issue is having 'Interoperable' conformity for SMHAN in place to commence market testing and enduring rollout utilising the DCC. In addition the 'Foundation' phase is assumed by Government to be the 'research' period to decide which HAN standards to adopt. In such circumstances how can Smart Change of supplier process commencing Q4 2012 work?

Page 48 of the consultation states that the Government is minded not to specify a single HAN Standard as part of the SMETS – at least for the Foundation period.

Taking this statement into account, the foundation period could be used to define a systematic approach to find the best way to prescribe a test regime, but it could not be applied to ensure technical or commercial interoperability for any equipment purchased during the Foundation period.

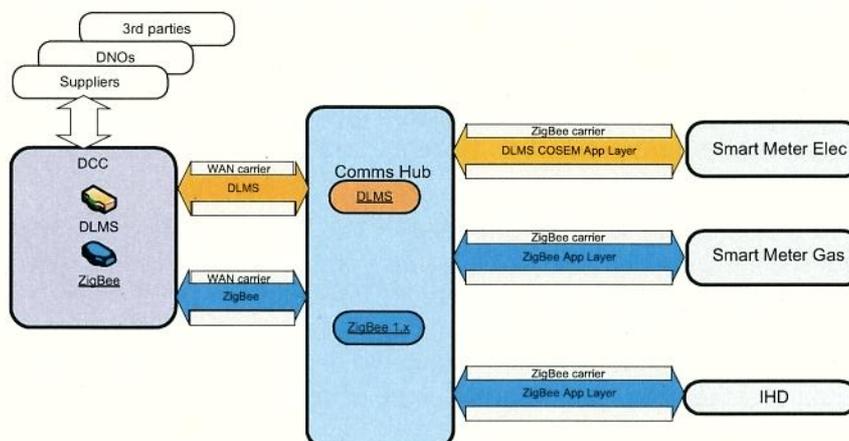
Question 39 Do you agree with industry’s recommendation that DLMS should be adopted as the application layer for communications with the DCC? Do you believe there are any consumer, economic or technical issues with this solution which could be circumvented by an alternative approach? Do you have any economic, technical or consumer evidence to assist Government in evaluating industry’s proposal?

We do not completely agree with this industry recommendation.

EDF Energy agrees that **DLMS is a well suited standard for the Smart Metering System**. We also recognise that having a uniform solution for the application layer of the multiple WAN solution providers would facilitate interoperability.

However, we think that **for timeline and costs reasons, the DCC WAN should support two application layers: DLMS COSEM and ZigBee SEP1.x**, in order to support devices used on the HAN most effectively.

Our preferred solution (with the current preferred HAN ZigBee) is presented in the drawing hereunder:



The communications hub would be handling two application layers. The smart metering equipment using DLMS [respectively ZigBee] application layer would be addressed using DLMS [respectively ZigBee] application layer from the DCC through the communications hub.

This approach would **avoid any step of translation**, either in the communications hub or elsewhere, as the DCC would be in charge of selecting an application layer depending on the equipment that is addressed (in the current proposal, ZigBee for IHD and gas meter, and DLMS for the electricity meter).

EDF Energy indeed thinks that a translation between the two application layers ZigBee

and DLMS in the communications hub would

1. **add complexity to the 27 million communications hubs required within GB**, with high impact if an upgrade is needed, while a simple application layer selection mechanism centralised in the DCC would be much easier.
2. **add costs to the communications hub**
3. **add time to the developments**: such a translation does not exist today and is not easy to put in place

It is anticipated that **ZigBee SEP2.x** will be available during the lifetime of the programme. Benefits of this should be evaluated to determine whether or not it should be supported. This could introduce an additional deployment phase to the programme, which would require a third application layer in the DCC.

Our answer to this question should be read together with questions 40, 48, and 49.

Question 40	Do you agree with industry’s recommendation that DLMS and Zigbee SEP 1.x should be adopted as the application layer for communications within the consumer premises, provided they install the necessary translation equipment? Do you believe there are any consumer, economic or technical issues with this solution which could be resolved by an alternative approach? Do you have any economic, technical or consumer evidence to assist Government in evaluating industry’s proposal?
<p>EDF Energy does not completely agree with the industry’s recommendation. EDF Energy does not believe that any translation should be performed within SMHAN. See our response to Q.39</p> <p>EDF Energy agrees that DLMS and ZigBee SEP 1.X are the two only available application layers for the Smart metering HAN at present.</p> <p>We think that DLMS is best suited for the electricity meter and that there is no option in this respect for the use of ZigBee.</p> <p>With regard to the IHD, we agree that ZigBee is the best solution indeed there are many instances within the current market for IHDs that are already using ZigBee.</p> <p>With regard to the gas meter, we think there is room to discuss the use of DLMS or ZigBee. Indeed, DLMS COSEM offers gas objects and is used for gas meters in other countries. It has been mentioned that the gas meter battery life was not compatible with the use of DLMS [DLMS application layer tunnelled over ZigBee lower layers] however we have not seen any calculations or test evidence to support this premise and accordingly recommend that more independent research is carried out in this area.</p> <p>As described in our answer to question 39, our proposed approach requires some very limited translations between some ZigBee and DLMS objects to display electricity information on the IHD. This translation would be performed in the communications hub and would need a very limited set of data items, requiring minimal development. This</p>	

development must be restricted to local communications between the IHD and the electricity meter only.

Question 41	Do you think the Smart Metering Implementation Programme objectives would be best met by the proposed approach above? Or should a single, network-layer technology standard such as IPv6 be mandated? Please explain your reasoning.
<p>EDF Energy believes the Programme should take a long term view and select a protocol that will last for the 10+ next years, such as IPv6.</p> <p>We recognise that government may not wish to prescribe technical solution but we recommend that whatever protocol is chosen, it is a single future proof and routable protocol and that it is supported by all WAN solution providers.</p> <p><u>NOTE on IP for the HAN:</u></p> <p>In answering this question EDF Energy would like to take the opportunity to advise that the choice of ZigBee SEP 1.X (which is not compatible with IP) is preventing the Smart Metering System from being IP 'end-to-end'. We recognise that ZigBee SEP 2.x (based on IP) is not ready at the time of writing, however, we would be in favour of evaluating the benefits of adopting ZigBee SEP2.x as early as possible, when the specification is available.</p>	

Question 42	Is the provision of a single network-layer address for each Communications Hub a reasonable and sufficient functional requirement for the Smart Meter WAN? Will this requirement limit potential future capability or present challenges, for example, in multi-occupancy buildings?
<p>EDF Energy does not envisage any reasons at this point in time why a communications hub would need any more than a single WAN network layer address.</p> <p>As far as multi-occupancy buildings and difficult property types are concerned, there is a gap in the analysis and there are no candidate solutions agreed within the industry. We think there is more work to do in this area to clarify the scope of the problem, before being able to understand if communications hub addressing scheme forms part of a more global answer to the multi-occupancy buildings.</p>	

Question 43	Do you think that maximum and minimum demand functionality should be included in the SMETS? Please provide supporting evidence for your response
<p>EDF Energy feels this is an IA decision. In principle EDF Energy will be supportive providing there is positive business case that supports networks in monitoring and managing the network to increase its ability to enable the addition of electric vehicles and heat pumps whilst lowering the DUoS charges that suppliers will have to pass on to their</p>	

customers. The DNOs need to build the business case for this requirement and make it clear why it is needed in addition to all the other data available to it via smart meters. As a network requirement the DNOs should pay for any uplift in costs to the Smart Metering Equipment.

Question 44	Do you think that network registers should be included in the SMETS? Please provide supporting evidence for your response (including the cost implications for Smart Metering Equipment, and any alternative approaches that would provide this functionality).
<p>EDF Energy does not support the provision of separate registers for network purposes. The additional network registers will only repeat the HH data available within the 13 months of import data and 3 months of export data held within the electricity meter. With the assumption that DNO will get access to this HH data, the registers will not be needed. Once HH settlements are in place, then the HH data will need to be extracted from all the SME as a matter of course. BEAMA have advised that the inclusion of these registers will cause a 3-6 month delay in producing a compliant smart meter as well as additional cost. Given these concerns, EDF Energy <u>cannot</u> support the inclusion of these additional registers.</p> <p>EDF Energy believes that the Supplier ToU registers would not be suitable for DNO use in managing the network.</p> <p>Given that if mandated in SMETS these registers will be provided to satisfy a network requirement, it is felt that the DNOs should pay for any uplift in costs to the SME.</p>	

Question 45	Do you think that the prepayment meter contactor switch should be utilised to protect consumer premises from “floating neutral” network faults? Please provide evidence on the costs and benefits to support your reasoning.
<p>EDF Energy is not supportive of the idea of using the prepayment meter contactor switch to protect consumer premises from “floating neutral” network faults.</p> <p>EDF Energy agrees that the provision of an overvoltage switch off facility provided by means of a smart meter is an attractive possibility. However, EDF Energy is of the view that there is a clear need to obtain further details with respect to the potential benefits. This really requires the ENA to come forward with more statistics related the numbers of serious incidents (house fires, electrocutions etc.) that the floating neutral issue is responsible for annually. Alternatively with regard to serious incidents the Health and Safety Executive may have statistics since major issues of this nature should be reported to them.</p> <p>Estimates discussed during the ESoDR/hothouse debates suggested that Network Operators could potentially be paying out up to £5 million per annum in compensation to settle claims in respect of damaged equipment. However, it should be said that this</p>	

estimate was based purely upon details provided by one Network Operator and clearly this figure requires ratification by the ENA.

Prepayment meters manufactured to the current standard IEC 62055 will not be capable of safely breaking load in all circumstances and accordingly EDF Energy would strongly object to such functionality being made available without a major revision of the standard. Furthermore, EDF Energy objects to this proposal because the design will need to be capable of:

- withstanding full line voltage
- disconnecting the supply at any value of voltage above a certain threshold up to full line voltage (440 volts)
- disconnecting the supply at any value of voltage below a certain threshold down to a yet to be specified practical operating limit
- breaking a load current of up to 1.7 times the nominal current rating of the meter i.e. at full line voltage (170A)
- satisfying additional standards relating protective devices.

The above operating conditions will dictate the need for a low voltage power pack capable of accepting a wide range of input voltages in order to drive the switch actuation circuitry. Additionally a high performance switch will be required.

Furthermore, there are concerns about the dynamic effects that will arise with a floating neutral situation occurring on say a heavily loaded feeder. On a three phase supply with a floating neutral individual phase voltages depend upon phase loadings. Obviously such loadings will dynamically alter as meters start to switch out. This could lead to a "cascade" situation and it is felt that a study will need to be carried out to determine if the likely effects of such a condition could cause other instabilities around the distribution Network.

Finally in the event of a sudden neutral disconnection arising from say the theft of copper at a substation, voltage levels will immediately alter leading in some cases to immediate and irrecoverable damage to customer's equipment and hence it is questionable as to how much money in the form of customer compensation will be saved.

In view of the above concerns, the lack of a positive cost benefit analysis and the likely manufacturing costs EDF Energy is not prepared to support this design suggestion.

Question 46	Do you agree with the proposed approach for consumers to access data and transfer it from the HAN via a separate "bridging" device? Please explain your reasoning.
EDF Energy agrees with the proposal for consumer to access data locally through a separate bridging device (option A). However, we think that the denomination "customer owned" may not be appropriate, as this type of device may not always be owned by the customer.	

This approach:

- does not hinder the smart metering programme
- does not add cost to the system
- leaves the customer with choice of its connectivity at home (wifi, Bluetooth) and allow for future technologies to be supported.

EDF Energy highlights the following points:

- This approach needs to enforce robust and appropriate security to protect the smart metering assets. In line with paragraph 178, we agree that there needs to be an appropriately secure but consumer friendly connection process, which should include the functionality to remotely disconnect devices if necessary.
- As the industry are in charge of managing the HAN and ensuring its reliability for billing and management of the system, there is a need to put in place a control which defines how devices are allowed to join a particular HAN.
- A bridging device should not be authorised to connect to multiple HANs simultaneously.
- For consumer bridging devices, there should be a centrally managed certification process that will provide a guarantee for the customer that the gateway product they purchase will be compatible with their smart metering system HAN.

Question 47	Do you have any views on the options presented to ensure that electrical contractors can work safely and efficiently between the electricity meter and the consumer unit/fuse box? Please provide evidence to support your reasoning.
<p>EDF Energy does not support the inclusion of additional switch functionality within the smart meter design.</p> <p>In terms of safety EDF Energy in line with its own zero harm policy fully endorses the Electricity Safety Council's view that that this is an area for consideration. Clearly any measure that reduces occurrences of unauthorised third parties opening service heads and meter enclosures is to be welcomed. It is suggested however that further evidence in the form of incident reports should be made available to justify such a requirement and that a positive business case is needed.</p> <p>Technically it is felt that options (1) and (2) are both feasible but having regard for requirement IM.1 which relates to the physical size of meters, views really need to be sought from meter manufacturers as to whether such modifications could be sensibly contained within the existing meter package size. With regard to option 3 this again might be viable in certain circumstances although space limitations at some sites preclude it from being a universal solution. It is understood that option 4 has previously been ruled out at a DCUSA* committee meeting.</p> <p>As to the costs given that the existing regulatory regime requires Network Operators to</p>	

control this activity it could be argued that those organisations should bear the outlay. However, the reality of the situation is that if any requirement was placed upon Network Operators to bear such costs they would simply be passed on to suppliers who would inevitably further pass them on to their customers. It is therefore felt that if such a feature is to be built into smart meters the industry will need to consider an equitable approach to cost smearing such that the electrical contracting industry didn't end up reaping the substantial benefits that such an initiative would yield at the cost of the supply businesses and ultimately all customers. Hence unless either an overwhelming business case can be prepared indicating substantial benefits will accrue to the supply businesses or an alternative source of funding is found it is difficult to see how this request can be accommodated.

Furthermore, there is a concern that such a requirement will add complexity to the design of smart meters leading to a delay in implementation. There are also concerns that some customers might choose to use utilise the switch facility of the meter rather than deploy an appropriate double pole main switch.

One further concern that EDF Energy would like to point out is that switch facilities provided for the purposes of isolation could be subject to abuse if located within an external meter cabinet or remote switchroom. This could lead to the risk of criminals maliciously disabling customer's supplies.

*The Distribution Connection and Use of System Agreement (DCUSA)

Question 48	Do you agree with industry's proposals for an overall architecture of an application layer standard with translation through a Communications Hub to a HAN? Do you believe there are any consumer, economic or technical issues
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EDF Energy does not agree with this proposal. As explained in our response to question 39, EDF Energy is in favour of a solution with no translation at all between DCC and end-devices.

The communications hub would handle two application layers, DLMS and ZigBee SEP1.x. It would receive messages from the DCC already using the targeted end device's application layer (DLMS for electricity meter, ZigBee for gas and IHD).

This would:

1. avoid the long and difficult process of setting up the translation scheme between these two application layers;
2. avoid spreading the translation complexity into million of communications hubs deployed across GB; and
3. reduce the cost of the communications hub.

Instead of providing translation within the SME, EDF Energy suggests that the two application layers should be directed into the DCC. The DCC would then select the appropriate application layer dependent on the type of device communication required.

With this solution, there is no translation requirement, just a simple selection of which application layer to use.

Question 49	Where do you believe that translation is best managed: a) At the Communications Hub; Or b) At the DCC? Do you have any economic, technical or consumer evidence to assist Government in evaluating the options?
<p>EDF Energy believes that there is no translation needed as the DCC can handle two application layers.</p> <p>Instead, there is a selection process, when DCC communicates to an end-device, picking the right application layer (DLMS or ZigBee).</p> <p>However, as described in our answer to question 39, our proposed approach requires some limited translations between some ZigBee and DLMS objects to locally display electricity information on the IHD. This limited translation would be performed in the communications hub.</p> <p>Please refer to our response to question 48 and 39</p>	

Question 50	Do you agree that the IHD should only be required to display ambient feedback based on energy usage? Please explain your answer.
<p>EDF Energy agrees that the IHD should only be required to display ambient feedback based on energy usage for a number of reasons:</p> <ol style="list-style-type: none"> 1. Displaying two separate ambient scales at the same time (one for energy use and one financial) could be confusing and misleading to the customer. Therefore, only one should be displayed at any point in time. 2. The display of energy (i.e. consumption) is the key deliverable of this programme. Carbon reduction and energy management are the main objectives so by displaying a customer consumption ambiently will hopefully enable them look, then manage their consumption based on the ambient indicator. 3. EDF Energy believe that the display of Carbon Dioxide should also be mandated as a display item on every IHD which customers can choose to display if they want. EDF Energy believe that as the primary objective of the national programme is to reduce carbon emissions, the display of carbon used based on each Suppliers fuel mix (at tariff level) will allow customers to start to engage with their carbon reduction responsibilities 4. In the early years of smart metering customers are unlikely to go straight to complex Time of Use (ToU) tariffs and so there will be a high degree of correlation 	

between kWh and £/p.

Question 51	Do you agree that Smart Metering Equipment should be designed to support the calculation and/or display of account balances as described above, even though suppliers may not initially be mandated to invoke such functionality for credit customers?
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EDF Energy has seen no evidence that credit customers want or require an account balance to be maintained on the meter. This functionality adds complexity to the Smart meter design and inevitable cost. This further diminishes the benefits that suppliers need to achieve to meet their own investment cases. We do not support the need to design meters with this functionality until evidence is provided that it will be cost efficient.

Suppliers have invested heavily in new billing systems to improve the customer experience and building this functionality into every meter would replicate much of the functionality already built in the back office systems and processes.

EDF Energy believes that the relationship and communication channels for Suppliers to communicate information to the customer should not be further mandated and left to the innovation and propositions defined by suppliers.

Additional functionality such as real time account balance for credit customers could be delivered through alternative mechanisms (maybe using prepayment functionality or providing access to a web interface) for those customers who require such information. Mandating this would lead to additional cost and a large number of customer disputes due to:

- timing issues from differences between IHD values and Account values,
- higher debt through customers not understanding the need to maintain a credit balance in the summer months
- and increased transactional costs from every payment having to be sent to the meter via the DCC.

Question 52	What do you think the costs and benefits are of mandating suppliers to display an account balance (over-and-above those arising from display of information on cumulative cost of consumption) for credit customers on their IHD?
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EDF Energy has considered the costs and benefits of displaying the account balance in some detail and provided a comprehensive spreadsheet of the impacts to DECC via the ERA.

EDF Energy can find little or no evidence to suggest that there are any tangible benefits achievable from displaying an accurate account balance to every credit customer aside from anecdotal evidence that some customers may use the figure to understand their monthly outgoings and may reduce consumption to remain within a budget.

EDF Energy believe that there are better and more cost effective ways to help customers budget through the internet, e-mail or even via new functionality on the meter; ToU tariffing or load limiting. We do not believe that mandating the display of the account balance on the IHD is a cost effective way to help customers reduce demand compare to the potential reduction in overall energy.

EDF Energy assessed the costs of 6 options shown below

	Solution	EDF Energy Costs (OPEX costs = Annual Transaction Costs)
Option 1	Display an Indicative account balance on the IHD monthly	CAPEX band B (£1-3M) OPEX band D (£10-50M pa)
Option 2	Display an Indicative account balance on the IHD daily or weekly	CAPEX band C (£3-10M) OPEX band E (>£50M pa)
Option 3	Display an Indicative account balance on the IHD upon normal cyclic billing or CoS	CAPEX band B (£1-3M) OPEX band B (£1-3M pa)
Option 4	Display an Indicative account balance on the IHD upon receiving a trigger from the customer. Assumes 1 minute processing	CAPEX band D (£10-£50M) OPEX band D (£10-50M pa)
Option 5	Calculate the Account balance on the meter using consumption and tariff information.	CAPEX band D (£10-£50M) OPEX band C (£3-10M pa)
Option 6	Remove the requirement	CAPEX band A (0 – £1m) OPEX band A (0 – £1m p.a.)

More detailed analysis is available on request

Question 53	Do you agree with or have any comments on the Government's proposals for the outstanding issues from the Response? Please explain your reasoning.
Q53.1 Standard meter interface language or languages	
<p>A53.1 EDF Energy agrees with the approach proposed by Government, and recognises the challenge presented in making a decision on the 'standard interface' prior to confirmation of both HAN and WAN transport layers. WAN procurement presents an unfortunate dilemma that may negate or limit the suitability of any decision made in advance of a decision on 'transport layer', and force a compromise that could lead to lack</p>	

of interoperability and constrain the systems ability to support future functionality and growth. EDF Energy appreciates the need for progress in a timely manner, but would emphasise the critical importance for 'best practice' to be applied in 'Architectural System and Network Design', modelling of any proposed Network topology, along with transport, application and security layers, as well as simulation and testing of the preferred and alternative approaches. The E2E coherency of the Smart metering infrastructure is vital in order to minimise the risk of poor operational performance or failure under a wide-range of operating conditions or inability to support technical interoperability, security or planned future requirements.

Q53.2 Assurance and Governance arrangements

A53.2 EDF Energy agrees with the Governments suggestions on the need for and governance associated with ensuring the robustness and coherence of the E2E Smart Metering Equipment both at launch and as an ongoing basis for the life of the service. EDF Energy would emphasise the need for central governance under the SEC and the establishment of a strong change control mechanism. In addition there is a need for: accreditation of compliant technology, systems, users and participants where appropriate to ensure the integrity of the processes, operational performance, security and safety of the Smart Metering Equipment.

Q53.3 Accessibility and inclusivity of IHD design

A53.3 As an active member of the IHD working group, EDF Energy believe that DECC should not to make any detailed recommendations regarding accessibility and inclusivity of IHD design. EDF Energy fully supports the notion of inclusivity but believes that manufacturers, through their work with consumer groups and research establishments, will produce devices that suit the largest number of customers. EDF Energy believes that if there is a need for a specific type of device to suit a specific disability group, we should be able to provide a suitable device of our own choice rather than be subject to a mandated solution that may indeed may risk alienating a different user group

Q53.4 IHD – minimum display requirements

A53.4 EDF Energy broadly agrees with the IHD minimum display requirements as they support the necessary functions that consumers require to monitor and manage their home energy consumption.

However, EDF Energy believes that DECC have made one omission to the minimum specification that will, in the near future, be required to support customers wish to reduce carbon emissions and even monitor their own savings. It is also the primary driver of the whole Smart Implementation Programme. EDF Energy believes that the minimum IHD should enable consumers to see their own CO2 use (current and historic) based on the associated generation fuel mix of the particular tariff and Supplier. Greater detail is provided in the EDF Energy response to Questions 24 & 50

Q53.5 IHD Update frequency

A53.5 EDF Energy agree with the working group and DECC's proposal for a 5 second update (electricity) and due to the impact on battery life, a 30 minute update for gas

Q53.6 Consumer access to consumption data

A53.6 EDF Energy recognises there are areas for further consideration around consumers accessing their smart metering data and would refer DECC to our response to the Data Access & Privacy Call for Evidence

Q53.7 Outage detection

A53.7 EDF Energy is of the opinion that Outage Management could be a useful feature of the national smart meter infrastructure design but views the beneficiaries as the Distribution Network Operators. Given this view it is felt that DNOs should fund this functionality. See also responses to Q31, Q32 and Q33.

Q53.8 Electricity Isolation Switch

A53.8 EDF Energy understands the desire of the Electricity Safety Council to incorporate/adapt one of the measures described in the consultation response document. Of the 4 options described EDF Energy believes that either option (1) or (2) would be the most practical. However, as the principal beneficiaries of this functionality will be the electrical contracting industry it is felt that an equitable approach to cost smearing needs to be devised so that the electrical contracting industry doesn't end up reaping the substantial benefits that such an initiative would yield at the cost of the supply businesses and ultimately all customers.

Furthermore, there is a concern that the provision of an isolation switch facility might lead to malicious switching in situations where meters are situated in external cabinets or remote switchrooms. See also response to Q47.

Q53.9 Smart Metering Equipment Data Items

A53.9 EDF Energy agrees that the Data Catalogue should be accepted as a basis upon which to move forward. We agree that this should be subject to section 3.3b as this will undoubtedly throw up some change requirements to the data catalogue.

We recognise that the work done so far represents a "logical" rather than a "physical" definition and that change will come about as business processes are refined and as the GB requirements are mapped to international standards which may have implemented the same principles in different ways.

We therefore believe that the Data Catalogue as defined by the SMDG Data Modelling Working Group (and the Entity Relationship Diagrams that accompany it) should be regarded as "live" documents that are updated to reflect changes and developments in the programme.

Q53.10 Smaller non-domestic (and large domestic) meters

A53.10 EDF Energy agrees with the Government's decision to grant a derogation allowing AMR meters to be used for non domestic supplies which are currently metered by CT operated meters. See also responses to Q11 and Q12

Q53.11 EMS

A53.11 EDF Energy believes that all smart metering equipment (SME) deployed should be specified to and comply with the relevant standards for EMS and susceptibility to