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7 January 2020

Appeal: Self-Governance Modification 0692S - Automatic updates to Meter Read Frequency

EDF Energy is appealing the decision to implement Uniform Network Code (UNC) modification 692s on the basis that it would lead to a high number of non-communicating smart meters being updated to a monthly reading frequency by the Central Data Services Provider (CDSP).

We acknowledge that the modification as proposed is appropriate for sites with an AQ 293,000 kWh or more, and for sites with AMR equipment onsite. However, the criteria set for establishing whether a meter is to be considered a smart meter does not account for a wide array of issues that impact Supplier's ability to provide monthly meter readings. Below is a list of scenarios where both the criteria and checks proposed under this modification would be satisfied, leading to meter reading frequencies being updated to monthly despite the fact a non-communicating smart meter is installed:

- The current Supplier is also the installing Supplier of a S1 meter however, this installation is accepted by the consumer on the basis smart communications are disabled.
- The current Supplier is also the installing Supplier of a S1 meter however, at the point of installation smart meter communications could not be established due signal strength issues.
- A S2 meter is installed and an active DCC flag is present however, there are Home-Area-Network (HAN) issues that require alternative HAN solutions such as dual band communication hubs.
- A S2 meter installation is accepted by a consumer on the basis smart communications are disabled or are not used at consumer request. In this situation an active DCC flag would be present despite the meter not communicating, or the supplier not having consumer consent to obtain data remotely from the meter.
- An S2 meter is installed but the DCC need to resolve a communication problem for remote meter readings to be sent and received. In this situation an active DCC flag would be present despite the meter not communicating.

- An S2 meter was previously installed but has been removed and replaced with a legacy meter (for example at consumer request). In this situation an active DCC flag would still be set even though there is no smart meter at the metering point (this will be addressed by SEC change MP077 – DCC Service Flagging).

In all scenarios outlined above the criteria and checks proposed by this modification would be fulfilled leading to CDSP updating meter reading frequencies to monthly despite all these situations having non-communicating smart meters. These scenarios are very common issues that impact smart meter connectivity, and there are limited checks and controls in place for the CDSP to identify non-communicating smart meters prior to updating meter reading frequencies to monthly. This modification will therefore unfairly prejudice Suppliers and Shippers by placing meter reading frequency obligations upon them that they cannot reasonably be expected to meet, and potentially apportion higher rates of UIG due to this.

As CDSP can never have a full set of robust criteria for checking if a smart meter can be read remotely by a Supplier then this aspect of this modification should be removed. It introduces unreasonable obligations for Suppliers and their Shippers which under this modification cannot be resolved.

Yours sincerely

A handwritten signature in black ink, appearing to read "John Mason", enclosed in a thin black rectangular border.

John Mason
Senior Manager of Customers Policy and Regulation