

Representation - Draft Modification Report UNC 0692S

Automatic updates to Meter Read Frequency

Responses invited by: **5pm on 12 December 2019**

To: enquiries@gasgovernance.co.uk

Please note submission of your representation confirms your consent for publication/circulation.

Representative:	Keith Watson
Organisation:	EDF Energy
Date of Representation:	12 December 2019
Support or oppose implementation?	Support/Oppose/Qualified Support/Comments * <i>delete as appropriate</i>
Relevant Objective:	d) Positive/Negative/None * <i>delete as appropriate</i>

Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)

We support the proposal to grant the CDSP the authority to automatically update the meter reading frequency of both Automated Meter Reading (AMR) meters and supply meter points where AQ increases to 293,000 kWh or above. However, if smart meters are to be included within the scope of this modification, and a mechanism for CDSP to effectively identify non-communicating smart meters prior to updating meter reading frequencies cannot be found, suppliers must have the ability to restore meter reading frequencies to annual in order to account for non-communicating smart meters.

We agree that low rates of meter read performance can be a significant contributing factor to Unidentified Gas (UIG) as identified by the UIG Task Force (as established under UNC modification 0658).

We agree with the proposal to exclude Non-SMETS (NS) and SMETS 1 (S1) meters where the supplier has changed after the installation date and the meter has not been enrolled with the Data Communications Company (DCC). However, the proposed solution as set out in the modification report does not account for the wider array of issues relating to the functionality and connectivity of smart meters, or how these would be considered by the Central Data Services Provider (CDSP) when automatically updating meter read frequencies.

Within the smart meter classification process outlined in the modification report it is proposed that if the meter does not have an 'active' DCC flag recorded within UK Link and is a SMETS2 meter it will be considered to be smart. This proposal fails to consider the possibility that a SMETS2 meter may be installed but not communicating, for example:

- A SMETS2 meter may be installed but DCC need to resolve a communication problem.
- Home-Area-Network (HAN) issues that requires alternative HAN solutions such as a dual band communication hub.
- Customer acceptance of a SMETS2 installation on the basis smart communications are disabled.

In the longer-term the use of the DCC Service Flag may enable the CDSP to effectively identify smart meters that are not operating as 'smart', however there are currently limitations to this process that mean it is not a viable solution at present. There are several issues related to the functionality of the DCC Service Flag held in the gas and electricity registration systems, these issues are the subject of proposed SEC modification MP077. Some of the specific issues that have been identified are:

- The DCC Service Flag is being set to 'active' where a smart metering system is installed but has not been commissioned, and therefore cannot be operated as 'smart'. It also appears that the DCC Service Flag is set 'active' when the meter status is set to 'whitelisted' or 'installed not commissioned' which is not what would be expected based on the definition of Enrolment within the Smart Energy Code (SEC) as found in SEC Section A 'Definitions and Interpretations' and H5 in SEC Section H 'DCC Services'.
- The DCC Service Flag will remain as 'active' even when a smart metering system is removed and not replaced or is replaced with a legacy meter as there is currently no DCC Service Flags to reflect that removal.
- The DCC systems include a value of 'not active' to address situations where a meter is, or has been present but is not operating in smart mode, but this value is not propagated into the registration systems.

Until a mechanism that enables the CDSP to effectively identify smart meters that are not functioning as 'smart' is found, the CDSP should not be granted the authority to automatically update the meter read frequency to monthly which could impose obligations on suppliers that they cannot meet.

Self-Governance Statement: *Please provide your views on the self-governance statement.*

We support the Modification Panel determination that this is suitable for self-governance procedures.

Implementation: *What lead-time do you wish to see prior to implementation and why?*

Implementation should be delayed until the outstanding change proposal to DCC flagging has concluded and a solution has been implemented. Alternatively, implementation should be delayed until a mechanism that enables CDSP to exclude sites from automatic updates to reading frequency where there are issues with smart metering equipment has been implemented.

Impacts and Costs: *What analysis, development and ongoing costs would you face?*

N/A

Legal Text: *Are you satisfied that the legal text will deliver the intent of the Solution?*

N/A

Are there any errors or omissions in this Modification Report that you think should be taken into account? *Include details of any impacts/costs to your organisation that are directly related to this.*

This modification does not consider any mechanism for the CDSP to identify smart meters that are not functioning as 'smart' due to the issues discussed above. While DCC Service Flagging may present a long-term solution to this, in its current form it does not provide a reliable mechanism by which to identify supply points where active smart meters are installed.

Please provide below any additional analysis or information to support your representation

N/A