

Title: **AMO response**
Smart Metering Implementation Programme
– Consultation on the second version of the
Smart Metering Equipment Technical
Specifications

Synopsis: To document the AMO response to DECC

Date: 7th October 2012

Prepared by:

Contact: www.MeterOperators.org.uk

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1. Introduction

1.1. Purpose

This document is the response to the consultation from DECC dated August 2012, seeking views on the Smart Metering Implementation Programme – Smart Metering Equipment Technical Specification¹.

We have concentrated our response only to questions that affect Meter Operators directly.

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 one members² of the AMO who include 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 are undoubtedly providing their own response directly to DECC. This AMO response does not necessarily represent the agreed views of every member on each issue. This response 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.decc.gov.uk/en/content/cms/consultations/cons_smip/cons_smip.aspx

² www.meteroperators.org.uk/members.php

2. Response to consultation questions

2.1. Communications Hub - Responsibilities

Question 14 – Do you agree with the Government's marginal preference for the CSP-led model for communications hub responsibilities, or do you prefer the supplier-led model?

Yes

We believe the CSP-led model for communications hub responsibility will be more efficient model;

- Provision of standard units that are not supplier specific will reduce the amount of equipment needed by installers supporting better management of van stock
- Knowing what equipment on site when installing 2nd meter or maintenance/emergency visit
- Volume purchase should enable lower prices
- Avoids confusion over rental payments where there are 2 suppliers at a site.

Specific consideration should be given to difficult buildings/high-rise units where specialist HAN arrangements are likely to be implemented. In this scenario it makes most sense for the CSP to be accountable for the maintenance of the HAN as in this case the HAN is essentially an extension of the Wide Area Network - a Neighbourhood Area Network (NAN).

2.2. Prepayment Interface Device

Question 27 – Do you agree with the proposal to include in SMETS 2 a specification for the PPMID, connected via the HAN?

Yes

The benefits of using a remote device to communicate with a meter include:

- Where meter location is poor location, typically high over a door, difficult location under stairs, external, communal position, etc.
- Minimise/eliminate the need to relocate meter under provisions in the electricity & gas acts for disabled people – saves cost for supplier and disruption for customer
- Opportunity for improved user interface, such as larger keypad of UTRN input, facilities for blind and deaf users, etc.

We accept that the use of a PPMID will not be appropriate in all circumstances and some meter relocations may still be needed to ensure the installation is 'safe and practical' but the use of the remote device will significantly reduce those occasions thus reducing the time needed on site and the disruption to the consumers.

Defining a standard specification for the PPMID will support interoperability of these units, which will make the installation of the 2nd meter, where the gas and electricity suppliers are different, and maintenance visit more efficient. Consideration should be given capturing and recording data relating to the installation of the PPMID to ensure suppliers and thus meter operators are fully aware when making subsequent visits.

2.3. Handheld Terminals

Question 30 – Do you agree that a specification for a HHT interface to the HAN should be defined? If yes, please identify the functions that this interface would need to support and the scenarios in which such functionality could be required.

Yes.

The use of the HHT is essential for efficient management of the meter installer's workload and the speedy and accurate return of data. Data held on the HHT will also be needed for the setup and commissioning of the smart meters;

- MPxN – data necessary during commissioning for the DCC to take on meters
- Meter configuration – where WAN is not available some suppliers may want the installers to configure the meters directly so demonstrations of the IHD will reflect consumers tariffs, prepayment balances etc
- Prepayment information – where WAN is not available suppliers may request meter operators to add credit etc.

Without the use of the HHT to communicate directly with the meter, this data could be manually loaded but this would require an input mechanism or could be set up via a direct connection at meter stores/back offices. However pre-configuring meters prior to visits restricts the use of that meters to the specific customer, thus removing flexibility in cases of emergency, no access and rearranged installers work schedule.

As meter operators will typically work for a number of suppliers the use of a standard interface will allow a single HHT to be used for all suppliers' customers. Individual or bespoke solutions could result in the need for each installer to carry multiple units.

The table below sets out the functions that this interface needs to support and the scenarios when these functions could be required.

Possible functions to be supported	Scenarios using functionality			
	Installation of SMS where there is a WAN connection	Installation of SMS but no WAN / fault / unavailable	Maintenance of SMS but no WAN / fault / unavailable	UTRN failure / lost / forgotten
Local pairing of devices	✓	✓	✓	
Initiate commissioning process (associate MPxN to relevant device) and receive outcome handshake	✓	✓	✓	
Configure HAN		✓	✓	

Restore / Configure meter settings		✓	✓	
SMS firmware upload		✓	✓	
Prepayment top-ups (emergency)		✓	✓	✓

Information previously presented on the HHT interface states it must meet the current smart metering security working principles. As currently determined, these principles exclude the connection of an HHT to the HAN without WAN involvement and local configuration of a meter by an HHT via the HAN. Revision of these principles to enable such functions should be considered subject to the impact on the business case of not allowing those options (number of revisits and/or meter replacements) exceeding the security compromise of enabling local configuration by an HHT and/or connection of an HHT without WAN involvement. A full analysis would include an estimate of the % of installations where the temporary unavailability of the WAN connection would require a repeat visit or meter replacement, which can only come from the CSPs and the (forecast) coverage of their WAN technology.

2.4. Assurance of Security Requirements

Question 32 – Do you agree with the proposal to establish independent assurance procedures for the DCC and DCC users? Please explain your views and provide evidence, including cost estimates where applicable, to support your position. Comments would also be welcome in relation to the impacts and benefits of the proposed approach with regard to small suppliers.

Yes.

All DCC users will need to provide assurance of their end to end systems and processes to ensure the security and integrity of the complete system. This will include Meter Operators who will have direct access to data via the DCC, as suppliers nominated agents, and through the use of HHT linked to the HAN. We fully support the need for an appropriate audit/test process to provide that assurance and support the establishment of independent assurance procedures. This will ensure that all users are treated in a uniform manner.

For meter operators this would be similar to the assurance obtained to operate under MAMCoP and MOCOPA and allows all suppliers we contact with to have confidence in our business operations. If assurance was left to individual suppliers as agents we would have to undergo testing for each supplier separately adding to cost and potential confusion.

We believe this assurance should cover aspects such as readiness to commence testing, at market induction or start up by new organisation and readiness to mobilise, following successfully proving operations with the DCC

Question 33 – Do you agree with the proposal that re-testing should occur at least at set intervals and more frequently when significant changes to the systems or security procedures are introduced? Please explain your views.

Yes.

We agree that re-testing should be undertaken at regular intervals and as appropriate after any significant change. The definition of 'regular intervals' should balance the benefit of regular audits against the cost, similarly an analysis of risk should dictate the amount and breadth of re-testing needed after implementation of major changes.