

**Title:** **AMO response**  
**Smart Metering Implementation Programme**  
**– A Consultation on New Smart Energy Code**  
**Content (Stage 3)**

**Synopsis:** To document the AMO response to DECC

**Date:** 14<sup>th</sup> February 2014

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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 3).

We have concentrated our response to Section 4 – Supplier Nominated Agents.

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 members<sup>1</sup> 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.

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<sup>1</sup> [www.meteroperators.org.uk/members.php](http://www.meteroperators.org.uk/members.php)

## **2. Response to consultation questions**

### **2.1. Question 18 - Do you think it is important that MOPs/MAMs are able to access DCC services directly? Please provide a rationale for your views.**

Yes.

The provision, installation and maintenance of the Smart Metering System are fundamental activities to delivering a successful rollout. Although the obligation to achieve the roll-out will be placed on Suppliers through licence conditions, it will be Meter Operators, organisations accredited to operate, registered via Ofgem and audited under MOCOPA and MAMCoP who will undertake the work backed by commercial agreements.

The strategy for delivering metering services within the smart metering market, and thus the relationship with Meter Operators will be different across the supplier community, especially where larger suppliers have integrated metering businesses for some or their entire nationwide customer base. Smaller suppliers typically rely more heavily on the detailed knowledge and experience of their metering agents to ensure a safe and efficient installation and maintenance service. The processes to support smart and the DCC operation must recognise these differences and provide options for working that does not disenfranchise any particular group.

At this stage when suppliers are still considering their deployment strategies it is vital to keep options open, particularly the ability to schedule installations in the most cost effective way. Typically this is achieved by minimising the abortive visits and travel time. Allowing the meter operators direct access to information on WAN availability, communication hub variants and existing smart metering devices installed will facilitate the efficient scheduling of site visits and ensure correct equipment is taken to site. This information will be needed a number of times prior to the installation visit; for initial deployment planning, which may be several months earlier through to the day before. Whilst this could be provided via the supplier there is considerable inefficiencies, opportunity for failure and time delays in passing multiple messages between parties, all of which could affect the service provided to the consumer.

The ability to request diagnostic information from a particular meter or communication hub will allow the Meter Operators to remotely view device faults before assessing whether a visit to site is necessary. The ability to do this 'first hand' is important where a supplier does not have the necessary experience and knowledge.

### **2.2. Question 19 - Do you have any views on the possible options identified for MOPs/MAMs to access DCC services? Please provide a rationale for your views.**

For the reasons above we believe it is essential meter operators are given access to the agreed DCC services therefore we do not support Option 1.

Both option 2 and 3 support Meter Operators access however we do not feel that option 2 would work in practice. The complexities in setting up and managing two mechanisms for meter operators to operate with the DCC would far outweigh any benefits

We believe Option 3 will be the most appropriate; acceding to the SEC code will formalise and strengthen the role of the meter operator whilst maintaining the flexibility to support both integrated and independent metering organisations and maintain metering competition.

### **2.3. Question 20 - Are there any other options which should be considered for MOPs/MAMs to access DCC services?**

Option 3 should be further enhanced by allowing Meter Operators to order communication hubs. These assets will be the same for each supplier but due to the initial ordering and charging arrangements meter operators will have to keep segregated stock when working for multiple suppliers. The Communication Service Providers are recommending carrying a buffer stock in vans in case of faults/breakages etc which will considerably increase the need for van capacity when scheduling site visits for a number of suppliers each day. 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 for some suppliers will increase efficiencies 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.

Also offering 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.