

## Code review programme #5

User: Andrew Toop

Submitted: 13/09/2023 2:12:20 PM

Reference: bce9d89a-414f-4736-aed0-b07c00230196

Summary of information submitted

### Who are you submitting as...

Industry participant

#### Which industry participant

Counties Energy Limited

### Code amendment proposal items

#### Would you like to submit on any items

Yes

#### Please select which item you'd like to submit on

Item 14 - Final interrogation of metering installations

*Q1. Do you agree the issue(s) identified by the Authority need attention? Please answer Yes/NO and comment if applicable.*

No. Counties Energy disagrees and believes that the EA has not demonstrated that the additional industry compliance cost outweighs the industry benefits.

*Q2. Do you agree with the objectives of the proposed amendment? Please answer Yes/No and comment if applicable.*

No. The amendment is impractical to achieve especially for MEPs who do not directly collect and process their own HHR data.

*Q3. Do you agree the benefits of the proposed amendment outweigh its costs? Please answer Yes/No and comment if applicable.*

No. It does not appear much work has been carried out to determine the costs, we believe the additional industry costs will greatly exceed the perceived benefits.

*Q4. Do you agree the proposed amendment is preferable to any other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010? Please answer Yes/No and comment if applicable.*

No. An adequate HHR profile estimation should typically be derivable from the final cumulative register read and this is sufficient data.

*Q5. Do you have any comments on the drafting of the proposed amendment? Please answer Yes/No and comment if applicable.*

The term modification is too broad because often a modification does not involve the meter (e.g. external relay for hot water control). Therefore, metering modification should at least be changed to "Metering installation modification impacting the meters HHR load profile data."

*Q6. Do you have any further comments on the proposal? Please answer Yes/No and comment if applicable.*

The proposal sounds good in theory only because in practice it will be difficult and expensive to implement.

*Q7. Is any part of your submission confidential? Please answer Yes/No and comment if applicable. If yes, please explain which part, why it is confidential and provide a publishable replacement (refer paragraphs 1.9 to 1.11 of the consultation paper)*

### Technical and non-controversial amendment items

*Would you like to comment on any technical and non-controversial items?*

No

### Cover note

*Would you like to add anything further to support your submission?*

*Please attach any covering comments to support your submission (optional)*

---