

## *Alt HAN Co Crowded Meter Room Project Phase 2*

# Industry Consultation

Alt HAN Co Crowded Meter Room Coordinator (CMR Coordinator / CMRC)

<b>Version</b>	V 1.0
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## Note to Respondents

### **Familiar with Alt HAN and the CMR Project?**

For respondents familiar with Alt HAN, the issue of Crowded Meter Rooms and the Alt HAN CO CMR Project, it is proposed you focus on Section 1, 3.5 and 3.6 prior to providing your responses from Section 4 onwards.

### **Unfamiliar with Alt HAN and the CMR Project?**

For respondents less familiar with Alt HAN, the issue of Crowded Meter Rooms and the Alt HAN CO CMR Project, it is advisable to read all of the introductory and supporting material ahead of providing your responses from Section 4 onwards.

### **Use of the term Building Network Operator (BNO)**

The term BNO or Building Network Operator is utilised throughout this consultation document. A BNO is responsible for the energy infrastructure within a building, apart from metering equipment or the main distribution equipment (distribution from the street). A BNO may be under the remit of a Building Owner, Managing Agent, Maintenance Company, Facilitates Manager or be the DNO (Distribution Network Operator) or IDNO (Independent Distribution Network Operator).

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# 1. Proposal to Establish the Alt HAN Co CMR Coordinator (CMRC)

This consultation proposes the establishment of a central Crowded Meter Room Coordinator, operated by Alt HAN Co.

It is recommended that a Crowded Meter Room Coordinator (CMR Coordinator / CMRC) is established as an additional function of Alt HAN Co in order to manage and coordinate the identification, validation and subsequent resolution of MDU Meter Rooms and Meter Cupboards subject to spatial constraints that prevent the installation Alt HAN Equipment, and therefore the successful deployment of Smart Metering.

The Alt HAN Co CMR Coordination function would operate as a central function, acting to coordinate between Energy Suppliers, MOPs, DNOs, IDNOs and BNOs / Managing Agents of Buildings.

The Alt HAN Co CMRC would receive and validate the Energy Supplier notified CMR cases and then subsequently work with the appropriate Resolving Parties (MOPs, DNOs, IDNOs, BNOs & their electrical contractors) to deliver an engineering resolution to the spatial constraint within a defined economic threshold.

The Alt HAN Co CMRC would centrally fund the execution of works through the Resolving Parties, which would subsequently be recovered with Energy Suppliers through an industry cost recovery mechanism.

More details on the operation of the Alt HAN CMRC can be found in Section 4.5.

The Alt HAN Co CMR Project, through this second consultation, seeks to obtain feedback from the GB Energy Industry, Building Management Industry and any other interested stakeholders, with regards to the establishment of a CMR Coordinator for the physical resolution of CMRs, led by Alt HAN Co, based upon a transactional model of delivery and cost recovery, with any works subject to a reasonable economic test.

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# INTRODUCTION AND CONSULTATION GUIDANCE

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## 2. Introduction and Consultation Guidance

### 2.1. Second Alt HAN Crowded Meter Room Industry Consultation

The Energy sector is making strong progress with the transition to smart metering. The policy goal is to have market-wide coverage by Smart Meters for all GB domestic premises by 2025. However, some buildings and premises (primarily Multi Dwelling Units, MDUs) are technically hard-to-serve due to the distanced locations of both the Electric and Gas Meters relative to the premises, and also in some cases, the space constraints around those meters in Meter Rooms and Meter Cupboards prohibiting the installation of equipment. Unless these issues are resolved this is likely to mean that some customers will be unable to enjoy the full benefits of smart metering.

The location of Meters, and any specific spatial constraints, are generally unique to each building and, in practice, there are many different combinations of problems. Furthermore, there are also different combinations of Industry participants who might have a role to play in helping to resolve the possible problems in installing Smart Meters in these buildings. The Alt HAN Co Crowded Meter Room Project generically refer to these sites as Crowded Meter Rooms (CMRs).

Alt HAN discussed the CMR challenges with BEIS and experts from across the energy industry and issued an initial consultation<sup>1</sup>, in Spring 2021, as part of a sector-wide process to gather views on the problems, and to identify options for how, collectively, the barriers to installation might best be reduced or removed. This work is being coordinated by the Alternative HAN Company (Alt HAN Co). Alt HAN Co, is an entity that is already working on behalf of all Energy Suppliers to develop a technical solution that extends the range of the Smart Meter Home Area Network (SM HAN) where a traditional smart installation cannot establish a HAN to premise(s) thereby limiting the smart benefits available to those customers in the affected premises. Alt HAN Co is therefore seeking to support Suppliers who are most directly impacted by space constraints in Meter Rooms or Meter Cupboards by enabling smart equipment and Alt HAN equipment to be installed to allow consumers to receive smart benefits.

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<sup>1</sup> The Alt HAN Co CMR Project Phase 1 Consultation is available to access, for context, via the CMR Sub-Group Huddle at [CMR Phase 1 Industry Consultation \(Huddle\)](#) . For those stakeholders that do not have access to this location, the consultation can be provided upon request from [Secretariat@althanco.com](mailto:Secretariat@althanco.com). Please note, the Phase 1 Consultation has now closed.

The insights and follow up work from the initial consultation supported the option for establishing a CMR Coordinator as an additional function of Alt HAN Co and utilising a transactional model of delivery and cost recovery, with any works subject to a reasonable economic test. The responses to that initial consultation also helped the Alt HAN Co CMR Project Phase 1 analyse and better understand the implications for a 'do nothing' approach, an approach considered unfavourable across the board.

Alt HAN Co is returning to stakeholders and industry participants across both the Energy and Building Management sector to undertake a secondary consultation on the subject and proposed mitigation of Crowded Meter Rooms. This second consultation seeks to outline a preferred and proposed mitigating approach, the Alt HAN Co CMR Coordinator, and attain views and perspectives across its potential scope, the expectations on stakeholders, consumer impacts, commercial impacts, and the legal & regulatory implications.

The results of this second consultation on the subject of resolving Crowded Meter Rooms will support the early requirements and design of a CMR Coordinator subject to Alt HAN Forum agreement.

## 2.2. The Crowded Meter Room Problem Statement

The following statement was established at the outset of the Alt HAN Co Crowded Meter Rooms Phase 1, and is retained for Phase 2 and this second Consultation:

*At the emergence of Alt HAN, the issue of Crowded Meter Room Coordination was widely discussed as a critical influencer on Alt HAN access and success rates in MDUs. All industry corners recognised the issue, but there was a general impasse in progress where no one party was ideally positioned to lead on addressing the issues in meter rooms. It is recognised amongst the industry stakeholders, for example the Smart Metering Operations Group (SMOG<sup>2</sup>) participants and Energy UK, that genuine coordination will not happen without a lead organisation establishing and executing a consistent procedure. The Crowded Meter Room Analysis has achieved a relative sizing of the problem and stakeholders see Alt HAN Co as a natural lead organisation in exploring mitigating actions and coordination for Crowded Meter Rooms.*

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<sup>2</sup> SMOG is a BEIS run group with representatives from energy suppliers, network operators, Ofgem, Citizens Advice, SmartEnergyGB and other stakeholders which discusses safety, operational and training issues.

## 2.3. Consultation Guidance

The Alt HAN Co Crowded Meter Room Project Phase 2 Industry Consultation has been released to key stakeholders across the Energy Industry and Building Management stakeholders and published on the Alt HAN Co website to encourage anyone to respond – there are no restrictions on who can respond to this consultation.

The consultation runs from **Tuesday 31st August 2021** to **Friday 24<sup>th</sup> September 2021**.

This consultation document provides respondents with the introductory and supporting material necessary in order to understand the background and context of Alt HAN Co, Alt HAN Equipment and the problem of Crowded Meter Rooms (Section 2 – Supporting Material).

The consultation document then provides respondents with a question and response section, whereby targeted questions are posed for the attention of the respondent's organisation.

Respondents are invited to provide views and perspectives to as many questions as possible but are not required to provide responses to all questions in order to submit.

Alt HAN Co assume that all responses reflect the views and perspectives of the organisation that the respondent represents. If you consider all or any part of your response to be confidential, please mark it clearly at the start of your response with any conditions otherwise all responses will be considered non-confidential.

**Responses should be sent to Alt HAN Co's Secretariat at [Secretariat@althanco.com](mailto:Secretariat@althanco.com) no later than 4pm on Friday 24<sup>th</sup> September.**

Please contact [gavin.beresford@althanco.com](mailto:gavin.beresford@althanco.com) or [david.jones@althanco.com](mailto:david.jones@althanco.com) for any additional queries.

## 2.4. Consultation Engagement Sessions

The Alt HAN Co CMR Project Team are offering recipients of the Consultation an opportunity to attend an Engagement Session, tailored to their Industry Function.

If you have not yet been invited to one of the sessions identified below, please contact [gavin.beresford@althanco.com](mailto:gavin.beresford@althanco.com)

### Sessions

- Monday 6<sup>th</sup> September – Energy UK and Members
- Tuesday 7<sup>th</sup> September – Association of Meter Operators (AMO) and Members
- Wednesday 8<sup>th</sup> September – Energy Networks Association (ENA) and Members

- Thursday 9<sup>th</sup> September – Independent Networks Association (INA) and Members
- Thursday 9<sup>th</sup> September – Building Management Stakeholders

## 2.5. Post Consultation

Following the closure of the consultation window on Friday 24<sup>th</sup> September 2021, the Alt HAN Co CMR Project Team will collate, review, analyse and compile a report on the outcomes.

The outcomes will be established within a publishable document to be openly shared on the Alt HAN Co website (<https://www.althanco.com>) as a critical output from the Alt HAN Co CMR Project Phase 2 at the end of October 2021. The Alt HAN Forum will consider the responses and any recommendations from the Project team.

Alt HAN Co will share and discuss the outcomes with the impacted parties, BEIS and Ofgem.



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## SUPPORTING MATERIAL

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### 3. Supporting Material

#### 3.1. Introduction to Alt HAN and Alt HAN Co

Over a million British households are currently unable to enjoy the many benefits of smart metering because they live in places where the components of their “Home Area Network” – energy meters, in-home devices and communications hub – are too far apart to connect with each other.

Alt HAN Co is a unique entity, a co-operative of the GB’s regulated energy suppliers, created specifically to address this problem; to design and manufacture a range-extending “Alternative Home Area Network” solution capable of connecting the devices required for residents to enjoy the full smart metering experience.

The introduction of Alt HAN Equipment, as a solution for extending their HAN, would involve the introduction of additional devices into the Smart Metering ecosystem. For the majority of MDU's where the Alt HAN Equipment is required, this will involve the additional use of a Wired P2P Device that is installed near to the Electricity Smart Meter and connected to the tails of that Smart Meter and at least one further device in the customers premises. More information on these devices is included in Section 3.3.

Alt HAN Co is currently in the final stages of agreeing a manufacturing contract, following an extensive competitive design and test regime with Technology Services Vendors. The design utilises a Wired P2P Device in the manner outlined in Section 3.3.

For more information about Alt HAN Co please visit <https://www.althanco.com/>

#### 3.2. Introduction to Crowded Meter Rooms

At the emergence of Alt HAN the physical issue and spatial constraints of Crowded Meter Rooms was widely discussed as a critical factor on Alt HAN Co's access and success rates in MDUs in order to successfully extend the HAN for Smart Metering Customers.

This reflected issues that have existed in the energy industry for many years. All the relevant industry stakeholders recognised the issue, but there was a general impasse in progress where no one party was ideally positioned to lead on coordinating or addressing the issues in

Meter Rooms and Meter Cupboards with regards to spatial constraints for Smart Meters and Alt HAN Equipment.

It was further recognised amongst those Industry stakeholders (for example SMOG participants, EUK, ENA and AMO) that genuine coordination or resolution will not happen without a lead organisation establishing and executing a consistent approach or set of procedures.

Crowded Meter Room Analysis for the impact on Alt HAN Candidates was conducted prior to the commencement of a Crowded Meter Room Project to understand the relative size of the problem and validate the typical CMR issues. It is estimated that Crowded Meter Rooms may impact the full HAN enabled provision of Smart for an estimated upper limit of 33,971 MDUs / 181,540 Customers (MPANs) in GB (based upon Alt HAN Market Sizing from 2020). The Alt HAN Market Size is currently under review to deliver a refined number of Alt HAN Candidates for 2021, and the CMR estimate will be evolved in line with any changes to that market size. The breakdown of how the Alt HAN Market Size for MDUs (Buildings) is expected to be impacted by CMR issues is outlined graphically in Figure 1 (see below).

Figure 1 Results of the Alt HAN Co CMR photographic analysis of 2500 sample MDUs, split by MDU Highrise, MDU Sprawling and MDU Compact



This graph in Figure 1 was formed from the result of the initial CMR analysis whereby a sample set of 2,500 MDU Meter Rooms and Meter Cupboards were visually assessed using photographic evidence. This assessment sought to validate and apply a complexity status to each of the data points, resulting in a RAG status for each MDU in the sample.

- ‘Green’ sites were considered not to suffer from spatial constraints.
- ‘Pale’ represented a spatial constraint resolvable by the consumer (a shelf for example).
- ‘Amber’ represented spatial constraints that were resolvable by an individual Smart Meter Installer and the point of install.

The remainder of the categories were issues that could not be resolved by a single Smart Meter Installer at the same time as an installation, and as such, would require a coordinated response.

- 'Dark amber' represented an issue that would require coordination between multiple Energy Suppliers/MOPs.
- 'Dark amber/brown' represented a spatial constraint that would require coordination with a DNO or BNO/Building Management
- 'Red', at the time of analysis, were considered likely too hard to resolve economically due to what were considered potentially immovable obstructions. However, 'red' sites may still be resolvable if deemed economic and achievable from an engineering perspective, and the critical and complex participation from Resolving Parties could be achieved.

The results show us that, where discounting the green, pale and amber RAG categories that are either not CMRs or can be resolved on the day of a Smart Install by a single Smart Meter Installer, the other, more challenging categories, from a coordination and engineering perspective, sit at between 16% - 21% of Alt HAN Candidate buildings overall, depending on the building type.

Whilst industry processes exist for individual organisations to meet their obligations related to specific issues, the resolution of metering issues in meter rooms currently lacks ownership for responsibility for planning, coordination, cost recovery arrangements for procedures that would result in minimal impact to building owners and consumers. Anecdotal evidence suggests circular handoffs between MOPs and DNOs exist. Further to this, in some cases resolution might require the involvement of the Building Network Operator (BNO). This activity is not explicitly contemplated in the regulatory framework for BNOs (unlike, for example, health & safety) and voluntary action might be viewed as unattractive by the BNO because of the impact on costs and rents. From the perspective of the Buildings Management industry, a BNO may take the form of a Building Owner, Managing Agent, Maintenance Company, Facilities Manager or even the DNO, for example.

The general energy Industry consensus is of no practical route to resolution, with no clear leader, ownership or delivery mechanism. It could additionally be considered that, in the long term, it may result in further costs to the Energy Industry, with a poor consumer experience, if the issue of spatially constrained meter rooms continues to be uncoordinated and unresolved, whereby a greater number of consumers than is necessary will be left without Smart capability.

Subsequently, some stakeholders saw Alt HAN Co as a natural lead organisation in project managing the exploration and shaping of possible mitigating actions/options for the coordinated resolution of Crowded Meter Rooms given its position as a body set up to manage the structurally similar challenge of delivering co-ordinated, market-wide solutions for extending the HAN.

### 3.3. What is Alt HAN Equipment?

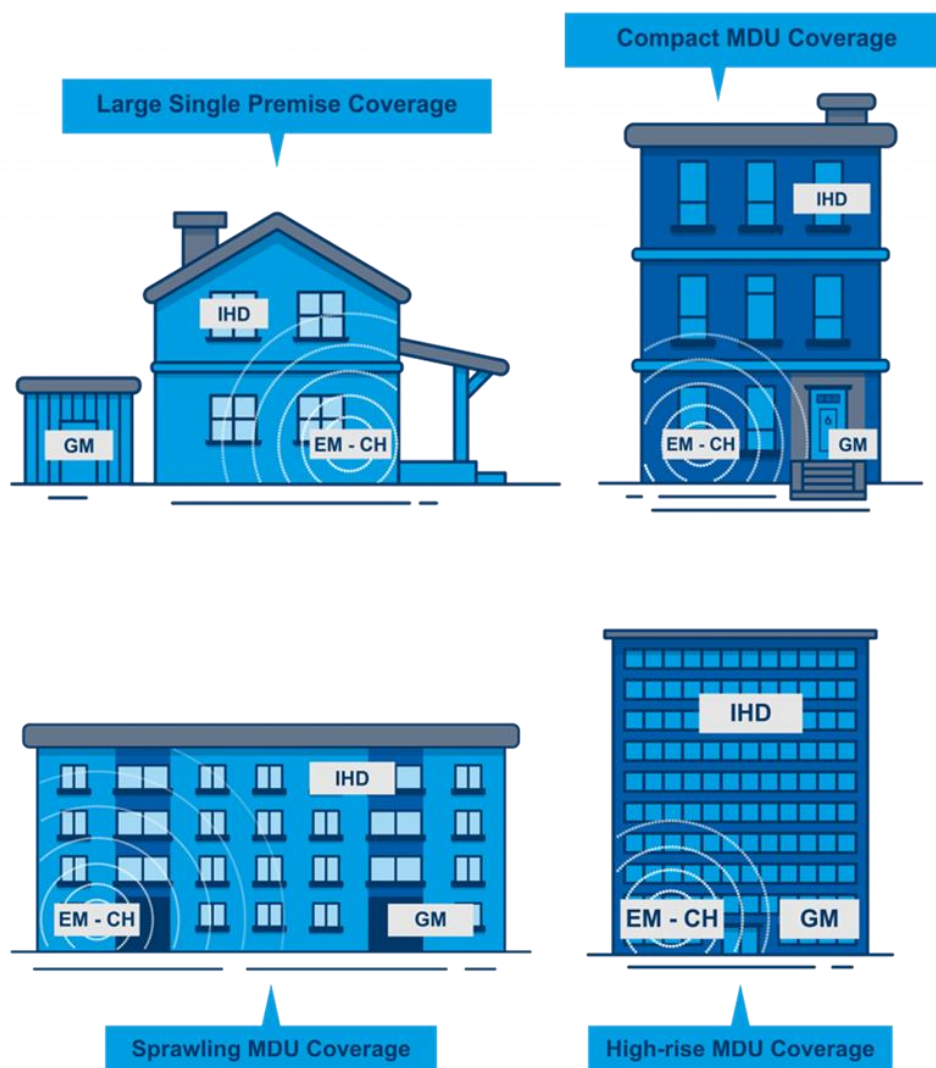
At its heart, Alt HAN Equipment acts to extend the Home Area Network currently available from a standard SMETS2 Comms Hub in association with an Electricity Smart Meter.

A standard Smart Meter's communications capability with other devices in its local network (e.g. Gas Meter, In Home Display or Consumer Access Devices<sup>3</sup>) is limited to the propagation capabilities of a 2.4GHz signal, akin to the strength of a broadband signal. This is further impeded by building materials and other environmental influencers, such as interference. Within an apartment block (Multi Dwelling Unit, MDU), meters are often situated in Meter Rooms or Meter Cupboards at a distance from the apartments they serve. As such, the standard Smart Meter's communications capability cannot reach those other devices (see Figure 1).

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<sup>3</sup> These are devices that the customer could introduce into their home to process information or obtain services using information from the smart meter transferred to the device using the Home Area Network (HAN).

Figure 2 The Alt HAN Use Cases, where the distances or obstructions between the electricity meter and other smart metering devices inhibits the communication between those devices



Alt HAN Wired Point to Point (P2P) Equipment extends the standard Zigbee 2.4GHz HAN provided by the Comms Hub by injecting that signal onto the consumers power line (Ring Main) for transmission into the premise via Power Line Communications (PLC) and subsequently returns it to Zigbee 2.4GHz via a 'plug-in' bridge within the Customer's premise.

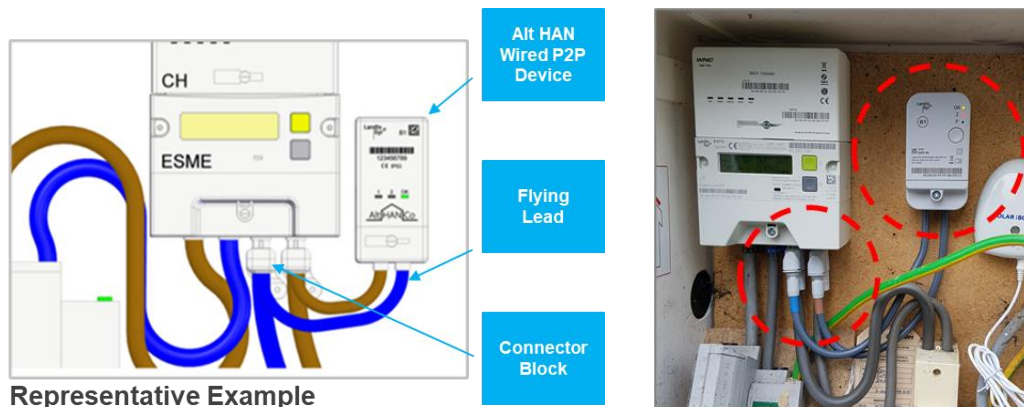
The Alt HAN Wired P2P Equipment is made up of four components:

- Firstly, at the Meter location, there is a Connector Block that sits attached to, and underneath, the Customer Tails (cable) of the Electricity Smart Metering Equipment (EMSE).
- Secondly, the Connector Block then attaches, via 'Flying Leads', to the Alt HAN Device itself (currently with a 300mm wire as standard). The Connector Block and 'Flying

Leads' both enable the Alt HAN Bridge Device to be powered and to carry the PLC signal injected onto the wire.

- Thirdly the Alt HAN Bridge Device itself, connected via the 'Flying Leads' sits in proximity to the Electricity Meter and its associated Comms Hub.
- Fourthly, there is a Plug-In end point device within the consumer premise that receives the PLC signal and converts it back to a 2.4GHz Zigbee radio signal for onward communication with the Smart devices within the home.

Figure 3 Representative Alt HAN Equipment Example



### 3.4. What is a Crowded Meter Room (CMR)?

A Crowded Meter Room, or CMR, is a term given by the Alt HAN Co Crowded Meter Room Project to represent a Meter Room or Meter Cupboard in a Multi Dwelling Unit (MDU / Building containing multiple premises) that contains a spatial constraint that prevents the standard installation of the proposed Alt HAN Equipment alongside the meters requiring this technology to extend their HAN, as outlined in Section 2.4. In some cases, the same spatial constraints are true for the standard installation of SMETS2 Smart Meters themselves, regardless of the need for Alt HAN Equipment.

The constraints may be, for example, the close collocation of Meters, the proximity of Trunking, Cut-Outs, Distribution Equipment, Risers, Customer Equipment, other Building Infrastructure and the Building Fabric itself. These constraints may sit in different jurisdictions of accountability, such as DNO, BNO, Energy Supplier or Customer.

Whilst the makeup of Meter Room and Meter Cupboards are generally unique across GB, the definition of a Crowded Meter Room scenario suggests a situation of Vertical or Horizontal Obstructions (such as Trunking, Cut-Outs, Isolation Switches, Risers, Distribution Equipment

and Customer Owned Equipment or other Building Infrastructure) that produce a spatial constraint that prevents the straightforward installation of Alt HAN Equipment, and in some cases SMETS2 Meters and Comms Hubs. The resolution of these issues may sit across multiple jurisdictions of Energy Suppliers, MOPs, DNOs, IDNOs, BNOs and Customers.

Examples of CMRs can be seen photographically below, followed by a set of common CMR scenarios that exist in a proportion (up to c.20%) of GB MDUs.

Figure 4 Representative CMR Examples – The images below would all represent CMR Type A & Type B Common Scenarios, as detailed in Table 1



Table 1 Common CMR Scenarios

Likelihood	CMR Type	Scenario	Description
Higher Likelihood	Type A	Inhibitive Closely Collocated Meters	Meters (Traditional or Smart) are too closely collocated in a fashion that prevents the successful installation of other Smart Meters and/or Alt HAN P2P Bridges or Connector Blocks.
	Type B	Inhibitive Trunking / Cable Trays	The Trunking or Cable Trays servicing the Meters are too close together, vertically (horizontally fixed), constraining space to the point that it impinges on the successful installation of Smart Meters and/ Alt HAN P2P Bridges or Connector Blocks.
	Type C	Inhibitive & Inconsistent Meter Installations	A Meter Operator / Supplier has successfully installed some Meters and left a 'First in best dressed' situation where those installations do not make fair or effective use of the space available to the future installation of other Smart Meters and/ Alt HAN P2P Bridges or Connector Blocks.
	Type D	Inhibitive Local Cut Outs / Isolation Points	The positioning of the local isolation points or Cut Outs from the MSDB (Multi Service Distribution Board) prevent the optimum use of space for the installation of Smart Meters and/ Alt HAN P2P Bridges or Connector Blocks
	Type E	Inhibitive Cabling	Cabling, either from the Cut-Out or to / around the Customer's Isolation Switch, is in a position that impinges on the successful installation of all or some of Smart Meters and/Alt HAN P2P Bridges or Connector Blocks.
	Type F	Inhibitive Customer Isolation Switches	The Customer's Isolation Switches are collocated next to, or in close proximity, to the meters and as such impinge on space for other ancillary devices, i.e. Alt HAN P2P Bridges or Connector Blocks.



	Type G	Inhibitive Redundant / Aged Equipment	Redundant or aged (and potentially larger than modern) Metering equipment such as time switches, connector blocks and contactors (electrically controlled switch) reducing the optimum space to install Smart Meters and/ Alt HAN P2P Bridges or Connector Blocks.
	Type H	Inhibitive MSDB / Main Cut Out	The Main Cut-out or MSDB configuration prevents the optimum use of space for the siting of Smart Meters and/ Alt HAN P2P Bridges or Connector Blocks.
	Type I	Inhibitive Looped or Crossed Neutrals	Looped or Crossed neutral scenarios at some or all of the Meter Positions in the Meter Room or Meter Cupboard prevent the standard installation of Smart Meters and/ Alt HAN P2P Bridges or Connector Blocks.
	Type J	Inhibitive Earth Bar	The Earth Bar is in a position that restricts the optimum use of space to install Smart Meters and/ Alt HAN P2P Bridges or Connector Blocks.
Lower Likelihood	Type K	Other Inhibitors	<i>Other issues that would less commonly occurs or not be traditionally resolvable (i.e. Solid Wall, Water Pipes, Gas Pipes).</i>

### 3.5. What is the Alt HAN Co CMR Coordinator (CMRC)?

Alt HAN Co is proposing the establishment of a CMR Coordinator, commissioning CMR resolution works to allow impacted Meter Rooms and Meter Cupboards to be made 'Smart Ready', i.e. ready to receive a standard Smart Meter installation (with Alt HAN Equipment where necessary).

The recommendation from the Alt HAN Co Crowded Meter Room Project Phase 1 was for the Energy Industry to pursue the establishment of a CMR Coordinator which would broadly operate to the functional principles outlined below:

- Operates as a central function within the Energy Industry (i.e. between Energy Suppliers/MOPs, DNOs, IDNOs, BNOs, Landlords & Customers)
- Receives notified CMRs supported by pre-requisite evidence
- Records and validates those CMRs against defined criteria
- Coordinates with the relevant impacted Energy Suppliers and Resolving Parties (DNOs, IDNOs, MOPs, BNO Contractors, Landlords & Customers)
- Works with Resolving Parties to establish a design blueprint and total costs of works for resolution per MDU and MPAN.
- Measures cost of works against an Economic Test ahead of an approval mechanism (an economic threshold per MDU or MPAN with an associated assessment of any loss of benefits)

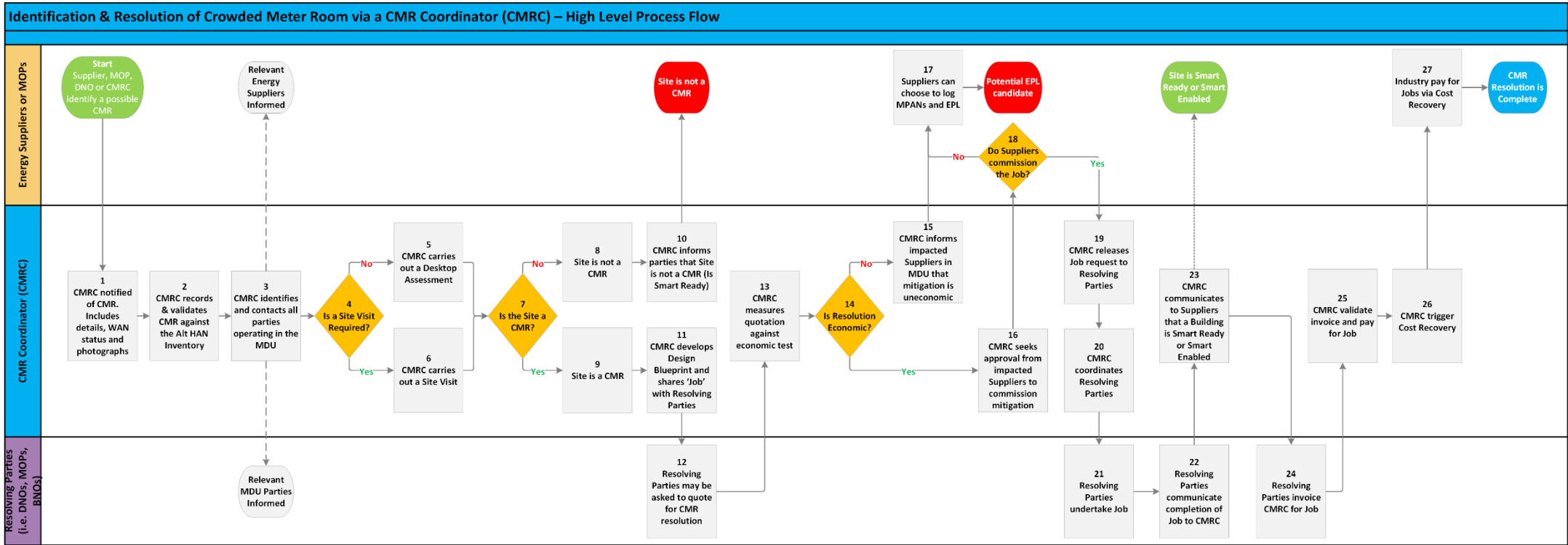
- Provides supporting evidence for Supplier Exempt Premises List (EPL) nominations to Energy Suppliers where it is deemed uneconomic to resolve a CMR issue
- Commission work with Resolving Parties for the resolution of CMRs
- Centrally pays Resolving Parties, where appropriate to do so, for the completion of works (CMR Coordinator is invoiced for works)
- Manages the fair cost recovery of those works across applicable Industry participants.

We believe the activities described above can be undertaken by Alt HAN under the existing regulatory framework (see Section 8).

*Scope Opportunity - Coordination of the efficient, 'Final Mile' installation of Smart Meters once a Meter Room or Meter Cupboard is 'Smart Ready', either through a thin model of coordination with Energy Supplier and their MOPs, or a thick model of a central MOP service competitively procured and organised by the Alt HAN CMR Coordinator function.*

These principles are additionally laid out in the following process flow diagram. This process flow is for contextual purposes only and could be subject to change:

Figure 5 Alt HAN CMR Coordinator High Level Process Flow



### **3.6. What is the likely outcome of doing nothing about premises affected by CMR?**

Within the Alt HAN Co CMR Project Phase 1 Industry Consultation, a number of proposed mitigating options were presented to stakeholders, inclusive of the option of 'Do Nothing'.

In the context of resolving Crowded Meter Rooms for the purposes of enabling the installation of both Smart Meters and Alt HAN Equipment, it was established that the option to 'Do Nothing' would not present itself as a nil cost or nil impact approach to the Energy Industry or energy consumers.

In analysing the impact of a 'Do Nothing' approach, the Alt HAN Co CMR Project Team were able to determine several considerations. A 'Do Nothing' approach:

- Would continue to leave the problem of spatial constraints preventing the installation of either or both a Smart Meter and Alt HAN Equipment to an appreciable number of Alt HAN candidates (up to 20% estimated of Alt HAN MDU candidates) as well as a number of standard Smart Meter installs. The impacted MPANs, or metered sites, will still be subject to the mandate on Energy Suppliers to take all reasonable steps to rollout Smart Meters, and as such, the CMR problem will still need to be resolved. Indicatively, the resolution or provision of adequate evidence to confirm that a meter installation is not physically or economically viable, will need to be forthcoming from Energy Suppliers for each affected MPAN by the end of 2025.
- Would prevent the realisation, for those MPANs, or meter sites, of the defined Smart benefits, as established by BEIS.
- Would likely lead to unnecessary exposure for Energy Suppliers and their MOPs to aborted installs and walkaways, at a direct cost to their operations. This is also likely to occur on a repeated pattern for those MPANs, or metered sites, that churn (change) Energy Supplier and subsequently seek for the installation of a Smart Meter.
- Does not allow consumers that actively wish to receive a Smart Meter to enjoy a successful install and positive Smart experience.
- May result in consumers experiencing a barrier or restriction to Smart enabled devices, restrictions to services and Energy products that could improve their Energy experience, restrictions to energy saving enablers and restrictions on tangible savings on a consumer's energy bill.

- May limit the benefits attained for Network Operators where data for the improved management of the Smart Grid is not available to its maximum extent.

Through engagement with the Energy Industry and responses to the Alt HAN Co CMR Project Phase 1 Consultation, stakeholders have identified that an approach to resolving CMRs must be established in order to successfully rollout Smart Meters to consumers in the associate impacted buildings. The approach developed is for the implementation of an CMR Coordinator to act centrally to support the Energy Supplier community in the identification, validation and coordinated resolution of CMRs through engineering works by Resolving Parties.

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## CONSULTATION QUESTIONS & YOUR RESPONSES

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This section provides respondents with a set of consultation questions with respect to the proposal for the implementation of the Alt HAN Co CMR Coordinator for Crowded Meter Room resolution.

Please provide a response to each question, where you are able to do so, in the tables below.

### 4. You & Your Organisation

The following questions provide the respondent with an opportunity to confirm their name, the name of their organisation and the function of that organisation.

Code	Question	Your/Your Organisation's Response
3a	Your Name	Your Response
3b	Your Organisation's Name	Your Response
3c	Your Organisation's Function	Your Response

### 5. Alt HAN Co as the CMR Coordinator

The following questions provide the respondent with an opportunity to articulate views and perspectives on the implementation of the CMR Coordinator and its scope.

#### Alt HAN Co as the CMR Coordinator

**Q1a. Do you agree with the CMR Coordination model proposed, with Alt HAN Co acting as the CMR Coordinator?**

**If not, please provide your proposed alternatives and rationale**

### Supporting Statement

It is proposed that Alt HAN Co, under its existing mandate to enable Smart Metering in those properties with limitations to their Smart HAN propagation, is the best placed organisation to undertake the role of the CMR Coordinator, on behalf of Energy Suppliers, to enable the identification, validation, communication, commercial arrangements and subsequent orchestration of a resolution to a CMR, subject to an engineering and economic test. Alt HAN Co, as the CMR Coordinator, would work with Resolving Parties (e.g. DNOs, MOPs, BNOs or a mix of those entities) to organise a coordinated resolution with costs subsequently recovered through Alt HAN's Charging Mechanism. Details of the proposed operating model can be found in Section 3.5.

### **Your Response**

Your Response

## **Scope of the Alt HAN CMR Coordinator**

**Q1b. Do you agree that the scope of the CMR Coordinator should be to resolve the spatial constraints apparent in an MDU's Meter Room or Meter Cupboards in order to achieve the installation of Alt HAN Equipment?**

**Q1c. Do you agree that where spatial constraints inhibit the installation of Smart Meters, but Alt HAN Equipment is not required, an Alt HAN CMR Coordinator could not resolve the issue without amendments the Alt HAN Co vires?**

**Note: The legal & regulatory aspects of these questions are further addressed in Question Section 9**

Supporting Statement

Alt HAN Co's existing and mandated industry role is to manufacture and distribute to Energy Suppliers Smart HAN range extending equipment for use in GB MDUs and Large Single Premises where the standard ZigBee 2.4GHz signal does not propagate far enough to reach other devices in a Smart Metering network (e.g. Gas Meters, IHDs). The implementation of this equipment by Energy Suppliers and their MOPs is designed to resolve that Smart communication gap when installing a standard Smart Meter. Alt HAN Co therefore holds the legal and regulatory vires to deploy approved solutions to resolve that communications gap. As such, Alt HAN Co recognises the issue of CMRs and the applicable spatial constraints in some metering environments to be a challenge that Alt HAN Co is already well placed to support in overcoming, where that site requires Alt HAN Equipment.

However, Alt HAN Co's current mandate would not allow it to actively participate in metering environments where Alt HAN Equipment is not deemed to be required. Therefore, for standard Smart installs impacted by CMR issues, but do not require Alt HAN Equipment, Alt HAN Co could not act or utilise the same proposed CMR Coordinator function to orchestrate a resolution. Alt HAN Co does not currently have a definitive view on the volumes of standard Smart installs impacted by CMR issues in GB MDUs.

### Your Response

Your Response

### 'Smart Ready' outcomes versus 'Final Mile' outcomes

**Q1d. Where the proposed operating model of the CMR Coordinator is to render a MDU impacted by spatial constraints 'Smart Ready', do you agree that Alt HAN Co should consider extending the CMR Coordinators scope to enable a 'Final Mile' coordinated installation of Smart Meters?**



**Please explain your response**

**Q1e. If Alt HAN Co considered extending the CMR Coordinators scope to achieve a ‘Final Mile’ installation of Smart Meters, do you broadly support either:**

- a. A ‘thin’ approach whereby the CMR Coordinator sought to coordinate with Energy Suppliers and MOPs to install their own Smart Meters at the same time as the CMR resolution.**
- b. A ‘thick’ approach whereby the CMR Coordinator organised for the for installation of Smart Meters at the same time as the CMR resolution using a contracted MOP service on behalf of Energy Suppliers that wished to take this ‘value-added’ service.**

**Note: The legal & regulatory aspects of these questions are further addressed in Section 9. The potential consumer benefits of these questions are considered in Section 7.**

Supporting Statement

The current proposed Alt HAN Co CMR Coordinator operating model would seek to attend to a CMR issue so that the spatial constraints were resolved and the MDU released back to Energy Suppliers as ‘Smart Ready’, for the subsequent installation of Smart Meters and the necessary Alt HAN Equipment by those Energy Suppliers at a later date. In a ‘Smart Ready’ only approach, the CMR Coordinator would not be seeking to coordinate or manage the installation of Smart Metering and Alt HAN Equipment at the same time as the CMR resolution.

Should the CMR Coordinator be steered to extend its scope to include the active coordination of Smart Meters and any necessary Alt HAN Equipment, Alt HAN Co would determine this in its operating model as a ‘Final Mile’ approach, extending the activities performed in a CMR resolution beyond ‘Smart Ready’.

At this stage, Alt HAN Co proposes two possible, broad approaches that could be taken with the ‘Final Mile’.

Firstly (a), a 'thin' approach would see the CMR Coordinator actively coordinate with Energy Suppliers and their MOPs to enable the installation of Smart Meters and any necessary Alt HAN Equipment at the same time as the CMR resolution is being actioned by the Resolving Parties in order to make an MDU 'Smart Enabled'. In the 'thin' approach, the CMR Coordinator would expect that the relevant Energy Suppliers Smart Meter installers for the applicable Energy Suppliers would be in attendance on the day of the CMR resolution.

Secondly (b), a 'thick' approach would see the CMR Coordinator contract, as part of its operating model, with a central MOP(s) that would act on behalf of the CMR Coordinator as a service provider in the installation of Smart Meters and any necessary Alt HAN Equipment. That central MOP would, through the agreement of the collective of impacted Energy Suppliers, provide the necessary Smart Meter Installers, Smart Metering Equipment and commissioning services to render an MDU 'Smart Enabled'. The CMR Coordinator operation would be 'thicker' in that it would take on responsibility for the delivery of Smart Metering installations and commissioning activity, through a contracted MOP service, on behalf of all impacted Energy Suppliers.

### Your Response

Your Response

## 6. CMR Coordinator Operating Model

The following questions provide the respondent with an opportunity to articulate views and perspectives on the proposed CMR Coordinator operating model, engagement with, involvement and impacts on critical stakeholders with respect to the implementation of a CMR Coordinator for the resolution of Crowded Meter Rooms.

### Working with Resolving Parties

**Q2a. Do you agree that Alt HAN Co has identified the correct Resolving Parties for the resolution of CMRs in its operating model?**

**Are there any other parties and how might they be engaged? Please explain your response.**

**Q2b. Where BNOs are challenging to identify and engage with, do you have ideas or suggestions on how the CMR Coordinator might best engage these Resolving Parties?**

Supporting Statement

Alt HAN Co's proposed CMR Coordinator operating model identifies engagement and the commissioning of CMR resolutions with Resolving Parties that are deemed to be responsible and capable for the delivery of engineering activities in metering environments.

Metering environments in GB are attended to under the defined jurisdictions of DNOs and IDNOs, Energy Suppliers and their MOPs, BNOs and their electrical contractors and Buildings Owner/Customers. CMR issues may fall into the jurisdiction of one of these parties, or span across jurisdictions where multiple CMR issues are in play.

The Alt HAN Co CMR Coordinator would seek to communicate with and commission, subject to an economic test, applicable engineering resolutions with these parties as 'Resolving Parties' under appropriate legal, regulatory, commercial and cost recovery models.

Building Network Operators (BNOs)

With respect to BNOs (Building Network Operator), this is a defined term given to the responsible party in an MDU for the maintenance of the infrastructure necessary for the safe and continues conveyance of energy within the building. The applicable assets can be, for example, trunking, laterals and risers and the cabling within, local cut-outs (beyond

the main cut-outs) and local points of isolation. A BNO could be a Building Owner, Managing Agent, Maintenance Company, Facilities Manager or be the DNO/IDNO.

An MDU's BNO is considered, in the Energy Industry, often difficult to identify and subsequently engage with. Furthermore, the BNO may sub-contract its relevant activities to an electrical or infrastructure contractor based upon private contracts. There is no centralised data collected on who BNOs, or their sub-contractors, are for any given building. The role of the BNO, whilst established under The Electricity Order 2001 (Class Exemptions from a License), is deemed a Class Exempt License (unlicensed distributor of energy), therefore is not subject to the same obligations, service level agreements and performance indicators that an explicit Energy Industry participant would be.

## Your Response

Your Response

## The requirements of Resolving Parties

**Q2c. If you represent a Resolving Party, what would you need in place for the CMR Coordinator to successfully and efficiently engage with you to deliver CMR resolutions?**

### Supporting Statement

The proposed operating model for the CMR Coordinator would require engagement with and subsequent engineering actions to be undertaken by Resolving Parties (DNO, IDNOs, MOPs, BNOs and their contractors) subject to the necessary agreements and economic tests. For the confident and successful delivery of CMR resolutions, the CMR Coordinator would need to establish clear channels of communication, agreements, working practices, engineering practices, cross party cooperation and coordinated scheduling with Resolving

Parties, where the culmination of the planning for a CMR resolution will need to result in targeted activity on a specific day, in a manner most efficient and of least impact to the end consumer.

## Your Response

Your Response

## 7. Consumer Impacts

The following questions provide the respondent with an opportunity to articulate views and perspectives on the consumer impacts with respect to the implementation of coordinated resolutions to Crowded Meter Rooms.

### Minimising disruption to consumers

**Q3a. Are there any critical considerations, regulations, or rules that the CMR Project should be aware of regards the potential for short term disruption to power for customers?**

**Please explain your response**

**Q3b. What actions could Energy Suppliers, the CMR Coordinator or the Resolving Parties take in order to reduce the impact on consumers when resolving CMRs?**

Supporting Statement

Alt HAN Co expects that the physical delivery of CMR resolutions by Resolving Parties will require some, or all, of the residents within an MDU to be subject to a short-term disruption in their power supply whilst works are completed. At this stage, it is an assumption that the necessary CMR resolution can be completed within a single visit, with power disruption kept to a minimum.

Whilst there may be some cases where a CMR resolution may not require disruption to power, it is more likely than not. As a result, Alt HAN Co respects that the experience and expectations of the consumers will need to be managed in a coordinated fashion by their Energy Suppliers and the Resolving Parties, either through existing consumer management mechanisms, or with bespoke treatments.

## Your Response

Your Response

## Optimal consumer outcomes

**Q3c. Do you agree that if the CMR Coordinator were able to achieve a 'Final Mile' coordinated installation of Smart Meters at the same time as a CMR resolution it would reasonably reduce the impact of resolutions on consumers?**

**Please explain your response**

### Supporting Statement

In considering the potential impact on consumers that may be subject to a disruption in power during CMR resolution activity, or see/hear potentially disruptive works occurring within their buildings, Alt HAN Co have considered that a 'Final Mile' approach (as outline in Q1e) may offer Energy Suppliers and their customers the opportunity to avoid further disruption by coordinating the installation of Smart Meters and any necessary Alt HAN Equipment at the same time as the actioning of the CMR resolution. Alt HAN Co proposes that this may be achieved under two possible models. A 'thin' model, where the CMR Coordinator seeks to organise Energy Suppliers and their MOPs to participate in the CMR resolution by installing Smart Meters on the day of the CMR resolution. Or a 'thick' model, where the CMR Coordinator contracts with a MOP service to install Smart Meters and any

necessary Alt HAN Equipment on the day of the CMR resolution, on behalf of Energy Suppliers.

## Your Response

Your Response

## 8. . Legal and Regulatory Perspectives

The following questions provide the respondent with an opportunity to articulate views and perspectives on the legal and regulatory aspects surrounding the implementation of a CMR Coordinator and coordinated resolutions to Crowded Meter Rooms.

### The Legal and Regulatory conditions for the operation of a CMR Coordinator

**Q4a. Do you agree that an Alt HAN CMR Coordinator function cannot undertake activity to resolve CMR issues (that prevent smart metering installations but not requiring Alt HAN Equipment) or undertake activity under the ‘thick’ model without regulatory change? Please explain your response.**

**Q4b. Do you agree that the CMR Coordinator should be able to rely on cooperation from Resolving Parties with existing obligations under energy industry governance without the need for additional regulatory changes? Please explain your response.**

**Q4c. Do you agree that the costs of CMR activities should be recovered as a type of Fixed Charge alongside other Alt HAN Fixed Charges? If not, what do you believe would be an appropriate charging and cost recovery mechanism for costs arising from the CMR Coordinator and resolution of issues?**

Supporting Statement

### Scope of the CMR Co-ordinator

*i) A CMR Coordinator which acts solely to address issues to enable Alt HAN installations*

Section 5 of the consultation sets out the scope for a CMR coordinator function that operates to resolve issues that would allow for the installation of Alt HAN equipment.

If the CMRC limits its activities in this way then the existing Supplier licence conditions (SLC 55 of the electricity and SLC 49 of the gas supply licences) which define the Alt HAN Activities and Services and Section Z of the SEC would permit the scope. The CMRC activities would be consistent with the Forum objective Z1,3(b)(i) 'to facilitate the economic and efficient carrying out of the Alt HAN Activities and provision of the Alt HAN Services'.

Additionally, if the CMRC sought to co-ordinate with parties responsible for the installation of smart metering and Alt HAN equipment upon completion of CMR issue resolution (under the 'thin' model' described in Section 5), this would also fall under the Activities and Services of Alt HAN. The coordination of activities to resolve CMR issues alongside responsible parties installing equipment should minimise the disruption to customers. This would be consistent with the Alt HAN Forum objective Z1.3(b)(iii) 'to ensure that Energy Consumers' experience of the installation of Alt HAN Equipment at their premises is consistent with their reasonable expectations'.

It is therefore proposed that no regulatory change is required to enable the CMRC for the scope of addressing CMR issues to enable Alt HAN installations. [see Question 4a]

*ii) A CMR Coordinator which additionally acts to address issues to enable Smart installations (that do not require Alt HAN)*

Section 5 of this consultation goes on to describe circumstances where there will be work required to resolve CMR issues that enable SMETS installations (but do not require the Alt HAN solution).



Whilst there may be benefits to the CMRC undertaking this additional activity (given it would undertake this work for Alt HAN affected premises and there is no parallel function for 'non Alt HAN' CMR issues) the existing Alt HAN regulations do not provide for this. In the event that the CMRC identifies works required solely to resolve issues for non Alt HAN installations then the CMR Co-ordinator could notify the relevant Resolving Parties but take no further action.

If stakeholders believe an Alt HAN led CMRC function should additionally resolve CMR issues associated with non Alt HAN installations then this would need to be supported by regulatory changes. For example, these could be to amend the licences to permit an extension to the Alt HAN Activities and Services. However, such changes would need to be progressed by the relevant authority (Ofgem or BEIS).

*iii) CMR Coordinator activities which include managing the installation of smart metering and Alt HAN equipment*

The 'thick' model for a CMR Coordinator described in Section 5 would involve the management of installation of smart metering and Alt HAN equipment in addition to resolving CMR issues. This activity would cut across existing competitive services and would require consideration of wider policy impacts and regulatory change. The Alt HAN regulatory framework does not allow for the 'thick' model. [see Question 4b]

#### Obligations to support the CMR Coordinator activities

There are already clear provisions on energy Suppliers to support the Alt HAN Activities in their licences and the Smart Energy Code (SEC). Energy Suppliers will exercise their support directly or via their appointed agents (e.g. Meter Operators).

There will be circumstances arising where support will be required from other 'Resolving Parties'. Not all of these Resolving Parties fall within the energy industry governance. For those that do, the CMR Co-ordinator would need to rely on existing relationships and obligations to give effect to resolving Crowded Meter Room issues. This would mean, for

example, that Network Operators would recognise the CMR Coordinator as acting on behalf of Suppliers when requesting works in support of addressing CMR issues. The alternative would be that modifications to the relevant codes (e.g. DCUSA) would be required to recognise the CMR Coordinator as a requesting party and establish obligations to support its activities. [see Question 4c]

Where a Resolving Party sits outside energy industry governance the CMR Coordinator would rely on the collaboration of the relevant individual/organisation to assist in the resolution of issues.

### Cost recovery and Governance

The key benefits arising from addressing CMR issues is the ability for customers to realise the benefits of smart metering and Suppliers meeting their rollout obligations and targets. Assuming the approach will be consistent with the current approach to recovering other Alt HAN charges, then costs would be recovered from energy Suppliers only, using the Alt HAN Fixed Charges mechanism.

Therefore, the costs associated with CMR Coordinator activities and resolving meter room issues, to make the room 'smart enabled' for Alt HAN installations could be set out as a separate item in the Alt HAN budget and consulted upon alongside the other Fixed costs, prior to budget submission to DCC. Suppliers would have transparency over the proposed costs and the ability to respond to the consultation on costs prior to Forum approval.

DCC would recover costs, alongside other Fixed Costs, using the same monthly billing process.

The SEC already allows for the recovery of costs for services for 'Alt HAN Activities' (set out in SEC Section Z4.2 (b) (1(i)), so no further regulatory changes as the activity is captured within 'Alt HAN Activities'.

The forecast costs would represent the budget available to be utilised under suitable authorisation. It is proposed that the Forum, or a sub-group, could review the proposed spend arising from planned works projected by the CMR Co-ordinator. Costs incurred

would be reported to the Alt HAN Forum alongside existing financial reporting. [See Question 4d]

## Your Response

Your Response

## 9. Commercial Perspectives

The following questions provide the respondent with an opportunity to articulate views and perspectives on the commercial aspects surrounding the implementation of a CMR Coordinator and coordinated resolutions to Crowded Meter Rooms.

### Economic test to justify works

**Q5a. Do you agree that the measure of disproportionate cost is the best application of an economic test, on a case-by-case basis, for any proposed CMR resolution, prior to commissioning any works with Resolving Parties?**

**What are your views on how this approach might be most suitably operationalised?  
Please explain your answer.**

#### Supporting Statement

A critical consideration is that any CMR resolution and request for works should follow the principle of 'not at any cost'. This is to say that possible engineering resolutions to CMRs are likely to vary in cost significantly depending on the issues encountered, and some of those resolutions may be considered un-economic. As such, the operating model of the CMR Coordinator would seek to agree, through the appropriate governance, and employ a reasonable economic test when deciding on whether to proceed with any given CMR resolution. However, it may be that there will also be

circumstances where industry obligations or consideration of long-term benefits to consumers outweigh some scenarios where the economic test is negative.

### Your Response

Your Response

## Interaction of the CMR Coordinator and the Exempt Premises List

**Q5b. Do you expect that the CMR Coordinator, in the process of applying an economic test against a CMR resolution, should be able to provide subsequent evidence to Energy Suppliers for an EPL nomination in the event a CMR resolution is deemed uneconomic?**

### Supporting Statement

Where the resolution of a CMR is determined to be physically unachievable or uneconomic, the operating model for the CMR Coordinator proposes that it may be able to provide a level of evidence to Energy Suppliers on both an MDU and MPAN level, relevant to the issue of spatial constraints, for the potential use against the Exempt Premise List (EPL). This list currently exists strictly for the purposes of Alt HAN candidates unable to receive Alt HAN for a number of reasons. The Exempt Premise List (EPL) is currently not applicable to sites unable to take a standard installation of a SMETS2 Smart Meter.

### Your Response

Your Response

## Commercial model for works undertaken at the request of the CMR Coordinator

**Q5c. Please provide us with your views on the principles and options for the commercial model for CMRs and if you are a [participating party] how you would like to be engaged and paid to do work on CMRs**

**Note: The cost recovery mechanisms are additionally addressed in Section 9**

### Supporting Statement

Given that Alt HAN Co has started to define the operational model above and the activities that might be required to resolve CMR issues, we have also started to develop the commercial principles that underpin payment for services. This section describes some of our early thinking so that we can take the opportunity to get feedback from stakeholders on how the commercial model might work. This has not yet been reviewed with external parties so please consider this an opportunity to highlight any input to Alt HAN Co to help shape our thinking.

We are considering the following commercial principles:

- Where services are contestable in the current market and able to be contracted from a number of parties, Alt HAN Co would run a procurement for services and contract with a small number of parties to undertake the necessary CMR activity to ensure value for money and prompt execution of services when needed
- Where services are provided under regulation, Alt HAN Co would take services from regulated services wherever possible and expect to pay on the basis of regulated rate cards to regulated SLAs
- There may be bespoke services that have to be considered separately

We would welcome a view from Resolving Parties on where their CMR services would sit and how they would expect to be under commercial arrangements to deliver CMR services.

The operating model highlights some of the difficulties we may have in engaging BNOs to deliver CMR services. We would welcome views on whether incentives might be required

to engage and commission BNOs to take part and what means might exist for ensuring we deliver value for money in contracting for BNO services.

Alt HAN Co contracting directly for CMR MOP services on behalf of Suppliers rather than trying to coordinate multiple MOPs would seem to deliver efficiencies (coordination overhead, expense of travel to site incurred by multiple MOPs, increased time on site with multiple MOPs coordinating activity). However, it is likely to need some special regulatory arrangements for Alt HAN Co to be able to contract with MOPs to undertake activities on behalf of Suppliers and some dispensation for a non-appointed MOP to act on Metering Systems. It is likely that Alt HAN Co would have to take on some liability for activities. We would welcome views on this model<sup>4</sup>.

We expect that this type of commercial model may require some sort of financing so that Alt HAN Co has a suitable balance sheet to pay for services and that this is likely to take a similar shape to the Solution Financing project in Alt HAN Co where Alt HAN Co has gone to market to secure financing at a competitive interest rate.

## Your Response

Your Response

## 10. Free Comments

The following questions provide the respondent with an opportunity to articulate any additional views and perspectives, in the form of free comments, on the implementation of CMR Coordinator and coordinated resolutions to Crowded Meter Rooms.

### Question 6a

Respondents are invited to submit any additional views or perspectives, not already sought through the other questions within this consultation, on the proposal to implement

<sup>4</sup> Alt HAN Co already employs the use of the Alt HAN Supplier Contract as a multi-party agreement governing engagement with its services.

an Alt HAN Co led CMR Coordinator based upon a transactional model of delivery and cost recovery, with any works subject to a reasonable economic test.

**Your Response**

Your Response

## GLOSSARY OF ABBREVIATIONS

Abv.	Full Name
Alt HAN / AHC	Alternative Home Area Network / Alt HAN Company
AMO	Association of Meter Operators
BNO	Building Network Operator (May be Building Owner or Managing Agent)
CMR	Crowded Meter Room
CMRC	Crowded Meter Room Coordinator
DCC	Data Communications Company (For Smart Metering)
DNO	Distribution Network Operator
ENA	Energy Networks Association
ESME	Electricity Smart Metering Equipment
EUK	Energy UK
IDNO	Independent Distribution Network Operator
IHD	In Home Display
INA	Independent Networks Association
MDU	Multi Dwelling Unit / Apartment Complex
MOP	Meter Operator (Installer)
RESOLVING PARTIES	DNOs, IDNOs, MOPs, BNOs and their infrastructure or electrical contractors
SMETS2	Smart Metering Equipment Technical Specifications 2
SMOG	Smart Metering Operations Group



## SUMMARY OF QUESTIONS

This section provides respondent with a summary table, for use as a convenient checklist, of all of the questions asked in the response section 'Consultation Questions & Your Responses'.

Number	Question
Q1a	<p>Do you agree with the CMR Coordination model proposed, with Alt HAN Co acting as the CMR Coordinator?</p> <p>If not, please provide your proposed alternatives and rationale</p>
Q1b	<p>Do you agree that the scope of the CMR Coordinator should be to resolve the spatial constraints apparent in an MDU's Meter Room or Meter Cupboards in order to achieve the installation of Alt HAN Equipment?</p>
Q1c	<p>Do you agree that where spatial constraints inhibit the installation of Smart Meters, but Alt HAN Equipment is not required, an Alt HAN CMR Coordinator could not resolve the issue without amendments the Alt HAN Co vires?</p>
Q1d	<p>Where the proposed operating model of the CMR Coordinator is to render a MDU impacted by spatial constraints 'Smart Ready', do you agree that Alt HAN Co should consider extending the CMR Coordinators scope to enable a 'Final Mile' coordinated installation of Smart Meters?</p> <p>Please explain your response</p>
Q1e	<p>If Alt HAN Co considered extending the CMR Coordinators scope to achieve a 'Final Mile' installation of Smart Meters, do you broadly support either:</p> <p>A 'thin' approach whereby the CMR Coordinator sought to coordinate with Energy Suppliers and MOPs to install their own Smart Meters at the same time as the CMR resolution.</p>

	<p>c. A ‘thick’ approach whereby the CMR Coordinator organised for the for installation of Smart Meters at the same time as the CMR resolution using a contracted MOP service on behalf of Energy Suppliers that wished to take this ‘value-added’ service.</p>
Q2a	<p>Do you agree that Alt HAN Co has identified the correct Resolving Parties for the resolution of CMRs in its operating model?</p> <p>Are there any other parties and how might they be engaged? Please explain your response.</p>
Q2b	<p>Where BNOs are challenging to identify and engage with, do you have ideas or suggestions on how the CMR Coordinator might best engage these Resolving Parties?</p>
Q2c	<p>If you represent a Resolving Party, what would you need in place for the CMR Coordinator to successfully and efficiently engage with you to deliver CMR resolutions?</p>
Q3a	<p>Are there any critical considerations, regulations, or rules that the CMR Project should be aware of regards the potential for short term disruption to power for customers?</p> <p>Please explain your response</p>
Q3b	<p>What actions could Energy Suppliers, the CMR Coordinator or the Resolving Parties take in order to reduce the impact on consumers when resolving CMRs?</p>
Q3c	<p>Do you agree that if the CMR Coordinator were able to achieve a ‘Final Mile’ coordinated installation of Smart Meters at the same time as a CMR resolution it would reasonably reduce the impact of resolutions on consumers?</p> <p>Please explain your response</p>
Q4a	<p>Do you agree that an Alt HAN CMR Coordinator function cannot undertake activity to resolve CMR issues (that prevent smart metering installations but</p>

	not requiring Alt HAN Equipment) or undertake activity under the ‘thick’ model without regulatory change? Please explain your response.
Q4b	Do you agree that the CMR Coordinator should be able to rely on cooperation from Resolving Parties with existing obligations under energy industry governance without the need for additional regulatory changes? Please explain your response.
Q4c	Do you agree that the costs of CMR activities should be recovered as a type of Fixed Charge alongside other Alt HAN Fixed Charges? If not, what do you believe would be an appropriate charging and cost recovery mechanism for costs arising from the CMR Coordinator and resolution of issues?
Q5a	Do you agree that the measure of disproportionate cost is the best application of an economic test, on a case-by-case basis, for any proposed CMR resolution, prior to commissioning any works with Resolving Parties? What are your views on how this approach might be most suitably operationalised? Please explain your answer.
Q5b	Do you expect that the CMR Coordinator, in the process of applying an economic test against a CMR resolution, should be able to provide subsequent evidence to Energy Suppliers for an EPL nomination in the event a CMR resolution is deemed uneconomic?
Q5c	Please provide us with your views on the principles and options for the commercial model for CMRs and if you are a [participating party] how you would like to be engaged and paid to do work on CMRs
Q6a	Respondents are invited to submit any additional views or perspectives, not already sought through the other questions within this consultation, on the proposal to implement an Alt HAN Co led CMR Coordinator based upon a transactional model of delivery and cost recovery, with any works subject to a reasonable economic test.