

## COMPLIANCE MEMO

**To:** Approved auditors, MEPs and reconciliation participants  
**From:** Peter Kerr, Compliance Manager  
**Date:** 15/06/2023  
**Subject:** Responsibility for data collection

In December 2013, the Authority published “Auditor Update number 8” (the Update) in which it stated that all HHR and NHH data collection is the responsibility of the reconciliation participant and only AMI is the responsibility of the metering equipment provider (MEP).

Since then, industry and technology has evolved and the 2013 interpretation of clause 8(7) of Schedule 10.6 is no longer fit for purpose. We have made an update to the advice in the second row of the below table:

Metering Type	Scenario	Responsibility	Comments
HHR	Where it is possible for other parties to interrogate the metering installation	Reconciliation Participant	Electronic interrogation.
HHR	Where the MEP <b>WILL NOT</b> provide the interrogation capability, password, or encryption details to the reconciliation participant.	Reconciliation Participant Metering Equipment Provider	<del>Although password means not possible for other parties to collect data, it is possible if MEP provides access. Electronic interrogation. If the MEP will not provide access then the MEP must be responsible for interrogation.</del> Electronic interrogation by the MEP.
HHR	Where the MEP <b>WILL</b> provide the interrogation capability, password, or encryption to the reconciliation participant.	Reconciliation Participant	Electronic interrogation.
AMI	Where the MEP <b>WILL NOT</b> provide the interrogation capability, password, or encryption details to the reconciliation participant.	Metering Equipment Provider	Note that where interrogation is via radio mesh or GPRS, the nature of communication and metering management systems means MEP back-office systems are required to meet code obligations for interrogation.

This update ensures responsibility for both AMI and HHR (commercial and industrial) metering are aligned under clauses 1 and 8 of Schedule 10.6. The update also ensures clause 2(1) of Schedule 15.2 applies equally to all metering types.

If the interrogation capability, password, or encryption is not provided to the reconciliation participant or the participant’s choice of agent, then the reconciliation participant cannot access raw meter data from the meter itself. In those cases, the MEP is responsible for interrogation of the metering and provision of raw meter data to the reconciliation participant.

This also applies if the MEP contractually requires the reconciliation participant to use the MEP's choice of agent – that agent is acting on behalf of the MEP and the Code obligations still rest with the MEP. The services access interface is still the MEP's back office even though the physical delivery of data may occur from the MEP's agent.

### Using an agent

When it interrogates a metering installation, a MEP has obligations under clause 8 of Schedule 10.6. If a MEP engages an agent/contractor to undertake interrogation of the metering on its behalf, the MEP is still responsible for compliance with the Code.

Regardless of which participant interrogates the meter, or where the raw meter data is accessed, the reconciliation participant **always** applies the registry compensation factor (clause 2(4) of Schedule 15.3). The MEP (acting as an MEP) must **never** apply the registry compensation factor (clause 8(10) of Schedule 10.6).

If the reconciliation participant uses an agent to collect raw meter data from the MEP (if the services access interface is the MEP's back office) or from the meter itself and the agent is applying the registry compensation factor, then this is done on behalf of the reconciliation participant and the reconciliation participant is still responsible for the Code obligation. The reconciliation participant's audit must include this process.

This applies even if the reconciliation participant is using the MEP as its agent. Who is responsible for what can be confusing if the MEP is interrogating the meter (because the services access interface is the MEP's back office) and the MEP is also processing the raw meter data into volume information as the reconciliation participant's agent.

For simplicity, the above advice is summarised in the following table.

Who accesses the raw meter data	Responsibility for Code obligations	Location of the services access interface	Who must apply the registry compensation factor to the raw meter data
MEP (access not provided to the reconciliation participant)	MEP	MEP's back office	Reconciliation participant
MEP's agent (access not provided to the reconciliation participant)	MEP	MEP's back office	
Reconciliation participant	Reconciliation participant	At the meter	
Reconciliation participant's agent (contractually directed by the MEP - access not provided to the reconciliation participant)	MEP	MEP's back office	
Reconciliation participant's agent ( <u>not</u> contractually directed by the MEP)	Reconciliation participant	At the meter	

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