

## Strategic Metering Review

### Hard to Read Meters - Definition & Guidance

*3 October 2022*

Water wholesalers, retailers and meter reading providers in the non-household market currently have different definitions of what is classed as a 'hard to read' meter.

To improve the consistency of approach across the market, this document proposes a list of standard definitions, which trading parties are encouraged to adopt. It has been produced following input from the [Metering Committee](#), and is provided for guidance only.

Trading parties are expected to continue working together constructively to address hard-to-read issues appropriately and in accordance with their existing Code responsibilities and obligations.

## Hard to Read Meters - Definition & Guidance

A meter is defined as 'hard to read' when it meets one or more of the following criteria:

- ◆ The meter cover is deemed a two-person cover lift
- ◆ The meter is deeper than 1.2m inside the chamber and/or a permit to work is required to enter safely
- ◆ The meter is deeper than 1.2m inside the chamber and chamber is permanently full of water due to a high water table
- ◆ Extensive signing, lighting and guarding is required by the [New Roads & Street Works Act 1991 \(NRSWA\)](#) to access the chamber and read the meter safely
- ◆ The meter chamber is situated in the carriageway or in a junction with a 50 mph or higher speed limit
- ◆ A street works permit, notice or temporary traffic regulations order (road closure) is required for accessing the chamber and reading the meter
- ◆ The meter chamber is under a road or rail bridge and the relevant bridge owner's authorisation is required before access
- ◆ The meter chamber is adjacent to a railway, dual carriageway or motorway junction and reading it may impact traffic flows on these routes
- ◆ The meter access point is in a permanently flooded area
- ◆ The meter chamber is in a registered contaminated land location
- ◆ The meter chamber is on private land with no owner agreed access or powers of entry, requires special access or arrangements to read or the meter location falls under an area of environmental or biodiversity protection
- ◆ The meter location falls under the [Working at Height Regulations 2005](#) or the [Confined Spaces Regulations 1997](#).

Where a meter installation meets any of the above criteria, both trading parties should work together to find appropriate solution(s) to remove the difficulty of reading that meter.

A meter should not be deemed as 'hard to read' in instances where the meter read provider is not carrying the appropriate equipment.

A useful reference document is the [RWG Metering Standards Good Practice Guide](#), which provides market guidance in relation to meter reading services with a view to encouraging a standardised and

consistent approach where possible. It includes roles and responsibilities for reading meters, including the health and safety aspects.

The list of definitions (above) aims to allow both Trading Parties to categorise their 'hard to read' meters consistently and work through a range of solutions to successfully obtain reads now and in future.

Solutions available to Trading Parties include:

- ◆ Carrying out and agreeing joint site risk assessments
- ◆ The removal of the hazard altogether
- ◆ Joint training and awareness for read staff
- ◆ The installation of remote reading technology to the existing meter
- ◆ Replacing the existing meter with an Advanced Metering Infrastructure (AMI or 'smart') or Automatic Meter Reading (AMR) meter
- ◆ Raising the meter in the existing chamber to a sensible height
- ◆ Re-siting the meter to a safer read location
- ◆ Changing covers/frames where safe to do so to aid access to read
- ◆ Obtaining access/powers of entry to read via a warrant

New non-household (NHH) market meters should always be installed in such a way to aid the reading of that meter. This may also include the use of technology such as AMI or AMR (described above) or wall-mounted boxes. Wholesalers' teams should work closely with their New Connections teams to ensure this is the case.