

Minutes

Meeting Name	DCP 054 Sub Group	Meeting Number	012
Meeting Date	01 September 2010	Meeting Time	10:00
Venue	ELEXON, 350 Euston Road, London NW1 3AW		

Attendee

Andrew Wallace
Angela Mann
Piers Merritt
Sasha Pearce
Alex Burford (Secretary)

Company

Ofgem
E.ON UK
British Gas
Npower Ltd
ElectraLink Ltd

1. ADMINISTRATION

- 1.1 Apologies were received from Anne Jackson from SSE Energy, Danielle King from E.ON and Kevin Woollard from British Gas.

2. MINUTES OF THE PREVIOUS MEETING

- 2.1 The minutes from meeting 011 were agreed subject to a typographical amendment to 4.3.

3. OUTSTANDING ACTIONS

- 3.1 An updated action log is attached as Appendix A.

4. DCUSA OBLIGATIONS

- 4.1 The subgroup noted the DCUSA obligations papers set out by AW. The paper highlighted the current DCUSA obligations and suggested a number of amendments. It was noted that the original intent of the CP was to bring the Code of Practice (CoP) into DCUSA document.
- 4.2 The group discussed the potential ways in which the CoP can be incorporated into the Agreement. The group noted it should ensure that all parties have an obligation to comply with the CoP. The group noted that elements of the CoP relate to meter operators, e.g. when they act for supplier by bringing information to their attention. The group noted that meter operators will be required to comply with the CoP through their commercial contract with the relevant supplier.
- 4.3 The group agreed that the best approach was to introduce to the COP as a new schedule within the DCUSA and noted that implementation into the SPAA should be considered. AW took an action consider how the CoP can be incorporated into SPAA.

Action: AW

5. CODE OF PRACTICE DISCUSSION

5.1 The group reviewed the framework for the CoP developed by SP.

5.2 The group agreed the objectives and developed the following high level principles for inclusion in the CoP:

- Objectives and Codes. The Group agreed to make no changes to this section.
- Make Safe. The group reviewed the high level principles. It was agreed that the Make Safe section needs to be of a higher level and it also needs to be made more relevant to disconnection.
- Costs are born buy those that steal. The group noted concern over the word 'thief'. It was agreed to change the word to 'appropriate person'.
- Standardisation. It was agreed to amend this section to ensure that parties maintain high standards.
- Obligations on Market Participants. AW noted that Wragges have reviewed their legal advice on theft in conveyance and are working on development further information. Wragge's focus is now on determining who is has reasonability in certain scenarios. AW noted that this section should link in with how the supplier charges the customer for the stolen units. The group agreed to place this issue on held until Wragges advice has been finalised.
- Information and Communication. AM noted that parties are required to comply with Clause 30 of the licence condition and that the CoP should refer to Clause 30.9 specifically. It was also agreed that the gas licence conditions should also be referenced in the CoP. AW took an action to review the potential relevant gas licence conditions.

Action: AW

- Information Exchange. AW noted that the group should consider the intended audience for the CoP. It was agreed to add a section on the Provision of information for DG to DNOs. AM took an action to circulate relevant information to SP to be included in this section.

Action: AM

- SP took an action to include a section in relation to gas in the Information Exchange section and ensure that gas sections are separated throughout the CoP.

Action: SP

- Provision of information to the Supplier by the RPS. AM noted that the E.ON policy lists information that the supplier requires from the RPS. It was agreed that this should this be added as an appendix. AM took an action to forward sections from the E.ON policy to SP for inclusion in the CoP.

Action: AM

- Provision of information to the supplier by the DNO/GT. It was noted that a section was added by AM for this issue. The updated section added a

reference to the DCUSA Clause 30.12. AM took an action to email the updated section to SP for inclusion in CoP.

Action: AM

- Provision of information from RPS from DNO/GT. It was noted that Revenue Protection visits are on behalf of the supplier not DNO. It was agreed that this section be left blank and to be reviewed following Wragges advice.
- Collection and Retention of Evidence. The group noted that the CoP should not allow RPS to inform customer they have potentially committed an illegal act. It was agreed that this section should reference the section on communication with customer.
- Maintenance of records. The group made no changes to this section.
- Assessment of unrecorded units. PM took an action to add a section on gas in relation to this section.

Action: PM

- The group agreed to speak to Consumer Focus at a later date in relation to who should inform the customer of their options when they have a complaint. AM took an action to circulate information on how customers can contact Consumer Focus.

Action: AM

- Supplier policies. The group agreed the section should reference DCUSA Clause 30.11. It was noted that suppliers should not inform customers what the Revenue Protection policy is. SP noted that an appendix on this section is still being developed and will be added to the CoP for the next meeting.

Action: SP

- Reports. AM to send through an update to SP on this section. It was noted that a monthly report should be sent through to the supplier.

Action: AM

- Information to Customer. It was noted that AM had updated this section since the last meeting. It was agreed that the Utility Act should be referenced and added as an appendix and that Suppliers should provide DNOs with a Revenue Protection statement, noting that any communication should be through the RPS. It was also noted that customers can contact the ombudsman should they wish to contest the issue. The group agreed to speak with Consumer Focus on this issue.
- Procedures for Investigation. AW took an action to update this section for the next meeting.

Action: AW

- Priorities and Timescales. It was noted that this section needs to be discussed further following Wragges advice. It was noted that when a DNO deals with a safety issue it should come under their safety procedural rules. AW noted that there is a side issue of abstraction of

units in this section and it should be considered when reviewing Wragges advice. KW took an action to work up a gas section on priorities.

Action: KW

- Conduct of Investigations. The group agreed to review this section again following Wragges advice.
- Rights to disconnect and withhold supply. AM took an action to review this section and send any update to SP for inclusion in the CoP.

Action: AM and SP

- Visit procedure/gaining entry. The group made no changes to this section.
- Disconnection of Supply and Recovery of Costs. The group agreed to add an appendix on this section to outline more information on the disconnection of supply and the recovery of costs. SP noted that there was still some work needed in relation to the electricity side.
- Treatment of Vulnerable Customers. The group agreed to review this issue when it meets with Consumer Focus.
- Re-visits. It was noted that AW reviewed the issue while also considering debt disconnection. AW took an action to circulate an Ofgem document on this issue to group.

Action: AW

- Safety and security issues. The group agreed that this issue of safety and security is also dealt with under the Health and Safety terms in third parts contracts. It was noted that meter operators must comply with the MOCOPA which also deals with health and safety matters.
- Qualified Persons. The group made no changes to this section.
- Incentive Scheme. It was agreed that an incentive scheme will be included in the CoP when it is handed over to the DCP 054 Working Group.
- Appendices. The group reviewed the list of appendices in the Code of Practice framework document. SP took an action to update the appendix section as per the group's instructions.

Action: SP

6. NEXT STEPS

- 6.1 The group agreed to organise one further meeting to discuss a number of issues with the Consumer Focus representative. SP took an action to speak to Consumer Focus.

Action: SP

- 6.2 The group agreed to complete their actions and forward to AB to collate and distribute before the next meeting.

Action: AB

7. ANY OTHER BUSINESS

- 7.1 There was no other business raised at the meeting.

8. DATE OF NEXT MEETING

- 8.1 It was agreed that a sub-group meeting will convene in the week beginning 29 September 2010.

APPENDIX A – ACTIONS**OPEN ACTIONS**

No.	Action	On	Due
009/01	Speak to National Grid and British Gas on the issue of gas appliance calculation for theft and report back at the next meeting.	All	15/09/10 The Group agreed to speak with internal staff in relation to information on compliance ratings. Action: All
011/03	Draft a section on the Communication to initiate an investigation for gas that could be included.	PM	15/09/10 PM to progress.
011/04	Circulate a table on supplier policies relating to venerable customers to the sub group	AM	15/09/10 On going.
012/01	Consider how the CoP can be incorporated into SPAA.	AW	15/09/10
012/02a	Update the following CoP sections in line with WG decisions: <ul style="list-style-type: none"> • Information Exchange • Suppliers Policies • Appendices 	SP	15/09/10

012/03b	Update the following CoP sections in line with WG decisions: <ul style="list-style-type: none"> • Information and communication, • Procedures for Investigation • Revisits 	AW	15/09/10
012/04c	Update the following CoP sections in line with WG decisions: <ul style="list-style-type: none"> • Information exchange • Assessment of unrecorded units • Reports • Rights to disconnect and withhold supply. 	AM	15/09/10
012/04d	Update the following CoP sections in line with WG decisions: <ul style="list-style-type: none"> • Assessment of unrecorded unites 	PM	15/09/10
012/05	Forward section form the E.ON policy to SP for inclusion in the provision of information section.	AM	15/09/10
012/06	Speak to Consumer Focus and invite them to the next subgroup meeting.	SP	15/09/10

CLOSED ACTIONS

No.	Action	On	Due
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011/01a	<p>Update the following CoP sections in line with WG decisions:</p> <ul style="list-style-type: none">• Objectives and Codes• Obligations on Market Participants• Sources of Information• Communication to initiate an investigation• Information Exchange• Collection and Retention of Evidence• Suppliers Policies• Visit procedure/gaining entry• Disconnection of Supply and Recovery of Costs• Qualified Persons• Appendices	SP	15/09/10 Complete.
011/01b	<p>Update the following CoP sections in line with WG decisions:</p> <ul style="list-style-type: none">• Information Exchange,• Assessment of unrecorded units,• Procedures for Investigation	AW	15/09/10 Complete.

	<ul style="list-style-type: none"> • Disconnection of Supply and Recovery of Costs • Treatment of Vulnerable Customers 		
011/01c	<p>Update the following CoP sections in line with WG decisions:</p> <ul style="list-style-type: none"> • Reports • Information to Customer • Priorities and Timescales • Conduct of Investigations • Disconnection of Supply and Recovery of Costs 	AM	15/09/10 Complete.
011/02	Update figure B of 2.3 in the Obligations on Market Participants section and circulate to SP.	AB	25/08/10 Complete.
011/05	Send to AW a similar a flow diagram for the Procedures for Investigation exchange in relation to electricity.	AB	25/08/10 Complete.
011/06	Add the issue of DCUSA obligations to the next agenda for consideration.	AB	25/08/10 Complete.
011/07	Forward completed actions to AB	All	25/08/10

			Complete.
011/08	<ul style="list-style-type: none">• Collate and distribute actions before the next meeting	AB	25/08/10 Complete.