

DCUSA DCP 195 Consultation Responses – Collated Comments

Organisation	Question 1. Do you understand the intent of the CP?	Working Group Comments
BG	Yes	Noted
EDF	<p>The roll out of smart meters to British customers has the ability to transform how customers understand and manage their energy consumption to deliver benefits to them and GB. It is therefore important that Suppliers are able to deliver these meters to their customers cost effectively and with a good customer experience to improve the perception and uptake of these smart meters.</p> <p>At its peak Suppliers will be required to install 30,000 meters a day in our customers’ homes. This level of installation has not been experienced before and it is likely that when undertaking these installations Suppliers will identify defective or defunct Distributor equipment that requires replacement before a smart meter can be installed. This therefore represents a once in a lifetime opportunity to inspect the Distributor equipment and ensure that it is up to standard and maintained properly.</p> <p>At the same time it should be recognised that where a Distributor fault is preventing installation the customer will already have had to take time to be at home for the appointment, but will not have received a smart meter. From a customer’s perspective this will not have been a good experience, and it is imperative that Suppliers are able to manage this by clearly explaining the next steps and timeframes to resolve this.</p> <p>We therefore support the intent of the CP as this will ensure Suppliers can manage expectations for resolving the Distributor fault and the timeframes for completing this. Ultimately the aim should be for Suppliers and Distributors to manage the appointment booking process so that the Distributor fault can be rectified and the smart meter installed on the same day to minimise the inconvenience for the customer; however, this may not be possible in an operational environment.</p> <p>We are concerned that without these SLAs there is a danger of creating a public backlash against the smart meter rollout in a world of social and mass media. The customer experience of staying at home to get a smart meter installed, being told that this is not possible due to a Distributor fault, and that the Distributor will eventually contact them at some indiscernible point in the future to arrange to rectify their fault, requiring a further day off work for the customer after which the Supplier will book another appointment to install a smart meter should be avoided wherever possible. This CP should go some way to address this, but we have some concerns with the detail of the CP and specifically the 2% cut off level for providing a good customer experience.</p> <p>Although Ofgem has provided a core allowance through RIIO-ED1 for DNO intervention work equivalent to 2% of smart meter installations, we would also note that there are clear mechanisms to review this</p>	The Working Group noted that EDF is supportive

	<p>funding and increase (or decrease) funding for the DNOs if 2% is not appropriate. Without a clear mechanism in the DCUSA to review this 2% cut-off as experience is gained, there is a danger that customers will be funding additional Distributor revenue without a corresponding increase in the service commitments and standards.</p> <p>We also have significant concerns about the reporting requirements for Suppliers detailed in the CP, and the lack of alignment between the reporting outlined against the other Supplier reporting requirements outlined by DECC, Ofgem and the DCC. . Suppliers are required to provide reports to both DECC, Ofgem, and in the future to the DCC. If these reporting requirements are not aligned then there will be an overhead in generating multiple reports, and an increased risk of misalignment between the various sets of data and projected rollout volumes. We would urge the working group to consider aligning the reporting requirements detailed in the legal text with other existing reporting requirements.</p>	
ENWL	Yes	Noted
Eon	Yes	Noted
Northern Powergrid	Yes, the intention being to set some robust rules around when network defects identified by suppliers should be resolved by the DNO (or IDNO) to support the smart meter roll out.	Noted
SP Distribution / SP Manweb	SP Energy Networks understands the intent of the CP	Noted
SSE Supply	Yes	Noted
SSE Distribution	Yes	Noted
UKPN	Yes	Noted
Western Power Distribution	Yes	Noted
Organisation	Question 2. Are you supportive of the principles established by this proposal?	Working Group Comments
BG	<p>Yes we are fully supportive of the principles established by this proposal. We believe this proposal will:</p> <ul style="list-style-type: none"> • Ensure safety related issues resolved in a timely manner • Ensure network related issues are resolved in a timely manner thereby improving the reliability and efficiency of the network • Improve the customer experience as the supplier will be able to provide the customer with an 	Noted

	<p>expectation of when the issue will be resolved and when they are likely to return to carry out the meter exchange</p> <ul style="list-style-type: none"> • Facilitate the scheduling of a joint visit where possible and minimise disruptions for the customer • Improve supplier business processes as they will have more certainty of when issues will be resolved and will be able to plan future work more efficiently 	
EDF	EDF Energy is broadly supportive of the principles established by this proposal, and specifically that Distributors have a responsibility to resolve issues with their equipment that is impacting on a Supplier's ability to install a meter, and to do so on a timely basis.	Noted
ENWL	We are supportive of the principles but have concerns over the lead up time prior to implementation. Without early sight of the volumes at post code/out code level it is difficult to assess the resources required and in what location. It would be useful if such information is made available in line with the letter submitted by the ENA to Energy UK.	Noted
Eon	Yes	Noted
Northern Powergrid	Yes, Northern Powergrid supports the principles of the proposal.	Noted
SSE Supply	We are supportive of a mechanism that ensures that network issues preventing the installation of a meter will be managed expediently through to resolution. There are some observations that we have raised but we recommend acceptance with a review period to revisit some elements once more intelligence has been gathered.	The Working Group discussed this comment and agreed that there would be merit in having a review in January 2015. An action was taken to include as a recommendation in the change report that a post implementation review be held.
SSE Distribution	Yes	Noted
SP Distribution / SP Manweb	In general, SP Energy Networks supports the principles behind DCP 195. We agree that there is a requirement for an SLA to be in place for resolving network operational issues however we have concerns which have been raised at the Working Group around the reporting requirements and the governance of such an SLA.	Noted
UKPN	We are supportive of the introduction of sensible SLAs and of detailed supplier roll out forecast reporting.	Noted
Western Power Distribution	Yes.	Noted

Organisation	Question 3. Do you have any comments on the proposed legal text?	Working Group Comments
BG	No	Noted
EDF	<p>We have the following comments on the proposed legal text:</p> <p>30.5A.3 – We note that the legal text does not cover the circumstances where the Distributor attends the premises but is unable to complete the work, or where the Distributor is not able to access the premises to complete the work. The text should be clear as to what should happen in these eventualities.</p> <p>30.5B.2 (a) – The definition of ‘contact details’ in this section needs to be clear, as per our response to question 13 below we do not believe that it is acceptable to reject a notification based on a telephone number not being provided.</p> <p>30.5B.2 (c) – The legal text does not make it clear what would happen if the Distributor were to attend the Premises but is not able to fix the Category B issue, clause 30.5D.2 only cover the situation where they are unable to gain access. We would expect the Distributor to make another appointment subject to the SLA timescales but this must be explicitly stated.</p> <p>30.5B.2 (d) – The legal text does not make it clear how a rejection would be made, we assume that this would be via a D0126 dataflow but this needs to explicitly stated.</p> <p>30.5D.2 (b) – The legal text refers to what would happen in the first agreed appointment but is not clear what would occur where the failed appointment is not the first appointment. Would this be handed back to the Supplier/MOP to engage with the customer, or would this remain with the Distributor for resolution?</p> <p>30.5D.4 – We have concerns about the use of the terms reasonable endeavours and the risk of variable interpretation of this across different Distributors. While it might not be appropriate to explicitly state what steps might be involved in meeting this in the legal text, we would strongly encourage Distributors to develop a consistent approach to ensure that all customers have a consistent and effective experience.</p> <p>30.5D.4 - The legal text does not make it explicit what should happen where the Distributor is not able to agree an appointment. Would this be handed back to the Supplier/MOP to engage with the customer, or would this remain with the Distributor for resolution?</p> <p>30.5E.2 – The legal text does not set out timescales for the sending of the D0126 flow as a result of the completion of work, this must be explicitly stated and should be a maximum of 10 working days in line with the timescales for Suppliers/MOPs generating flows as a result of a site visit.</p> <p>Schedule (x) Part 4 – In line with our comments elsewhere around reporting the legal text in this section needs to be clearer in regards to what is being provided in the forecast reporting. In order to ensure reporting consistency the legal text should refer to a ‘forecast of attempted smart meter installations’ in</p>	<p>The Working Group discussed EDF’s response and noted the following:</p> <p>30.5A.3 – it was noted that this clause refers to a category A situation. A suggestion was made that a standardised procedure could be drafted outside of DCP 195. DB took an action to raise this with the ENA Service Termination Issues Group (STIG).</p> <p>30.5B.2 (a) – it was noted that this is a question later in the consultation.</p> <p>30.5B.2 (c) – It was agreed that the following should be added to the end of the clause “In the event that the situation cannot be remedied on the first visit a further appointment will be booked to remedy the situation as soon as reasonably practicable.”</p> <p>30.5B.2 (d) – it was agreed to pick this up under the question on rejecting D0126 flows</p> <p>30.5D.2 (b) – the group noted that the D0126 would be handed back.</p> <p>30.5D.4 – It was agreed that this should also be raised with the ENA STIG</p> <p>30.5E.2 – to be discussed whilst considering later questions</p> <p>Schedule (x) Part 4 – to discussed whilst considering later questions</p>

	line with the DECC forecast reporting requirements.	
ENWL	<p>Below are initial observations. No doubt there will be other changes as a consequence of our response to the specific questions below.</p> <p>Clause 30.5A.4 – it would be useful for the Distributor to notify the Supplier/Mop that a further visit is required so that they do not assume that the work was completed within 3 / 4 hour timescale</p> <p>Clause 30.5B.2 – ‘reject’ is not a valid value. This will need a change to the data flow to include, but we support such an initiative.</p> <p>Clause 30.5C.1 – there is a missing word in the first sentence. Please add ‘using’ between ‘enquiry’ and ‘the’ on the fourth line. This would then align with clause 30.5B.1</p> <p>Clause 30.5D.1 – we seem to refer to Schedule 23 in this clause yet refer to Schedule [x] in other clauses. Schedule 23 now covers the revenue protection Code of practice. Please change to Schedule [x]</p> <p>Schedule [x] part 2 – we have concerns over the inclusion of the asset condition codes within DCUSA. The industry will then have three locations for these. MOCOPA, MRA (within the DTC) and now DCUSA. Any change will necessitate all three to be changed. Who is the owner of asset condition codes? Our view is that it is MOCOPA. Controls need to be put in place to ensure that we keep documents aligned and that the owner controls the governance of change.</p> <p>Schedule [x] part 3, report – we need to include the distributor name as well</p> <p>Schedule [x] part 3 report – it would also be useful to add in an extra report covering dumb meters where the fault is with them. This also affects the work that distributors undertake due to a call that should be handled by the supplier’s Mop.</p> <p>Schedule [x] part 5.2 – we need to agree a default value should a supplier’s not meet there service level. Otherwise the figures will be skewed. It would seem appropriate to base the value on the last reported volumes whilst the issue is being resolved. Alternatively, the supplier in question will not receive any data in the service level agreement report.</p>	<p>The Working Group reviewed the comments received and noted the following:</p> <p>Clause 30.5A.4 –the group discussed this scenario agreed not to amend this clause</p> <p>Clause 30.5B.2 – It was suggested that the D0126 flow data items should be reviewed around the ability to use the D0126 to feedback information. An action was taken to raise this with the MRA Issue Resolution Export Group (IREG). This should be aligned with the defect code changes currently being discussed by MOCOPA.</p> <p>DNO attendees took an action to feedback to KW on areas where they have concerns with the D0126 and D0135 flows so that KW can pass this information into the IREG discussions.</p> <p>Clause 30.5C.1 – updated during meeting</p> <p>Clause 30.5D.1 – updating during meeting</p> <p>Schedule [x] part 2 – it was noted that this area had been discussed previously and it has been agreed that it is best if the asset condition codes appear only in one place.</p> <p>Schedule [x] part 3, report –Legal text updated to say “Distributor Party” during meeting. It was observed that IDNOs would complete only one column whilst DNOs would complete one column per licence area. The working group discussed the suggestion that dumb meters be included within the reporting and agreed not to take it forward.</p> <p>Schedule [x] part 5.2 – the group noted that</p>

		<p>there will be the ability to go to the DCUSA Panel and it is in Suppliers interests to provide the forecasts.</p> <p>The group agreed that some words are needed in the legal text to capture the importance of the quality and consistency of reporting. Working Group members took an action to consider appropriate wording prior to the next Working Group meeting.</p>
Eon	Not at this stage	Noted
Northern Powergrid	We have no further comments on the legal text, one of Northern Powergrid's managers is on the working group and his comments were covered off at the last working group meeting on 22nd January 2014.	Noted
SSE Supply	None other than are outlined later in this response.	Noted
SSE Distribution	<p>General - we believe that throughout the text, the relevant 'Prescribed Period' (i.e. the relevant number of days) should actually be identified wherever the term is used in a Clause, rather than by reference to a table. This would make use of the DCUSA text much easier and also be less likely to lead to mistakes and misunderstandings.</p> <p>Clause 30.5A.4 – we feel that clarification is needed as to how a 'made safe' Category A situation is subsequently managed and reported on. Should a Category A situation which is made safe then be re-categorised and reported as a Category B?</p> <p>Clause 30.5B.2 – item (d) – we believe that the requirement to reject the flow conflicts with MRA obligations and code alignment must be maintained.</p> <p>Clause 30.5E.1 – we believe that this Clause should be worded:</p> <p>Where the Company has not met the Service Level for a Category A Situation or Category B Situation, the Company shall, where it considers it reasonable to do so, give priority to the resolution of this situation over others notified under Clause 30.5B.</p> <p>We feel that this is necessary to avoid creating any perverse incentives and/or obligations.</p> <p>Part 4 Table – we do not believe that the inclusion of GSP Groups is helpful or required. Due to embedded networks, it does not necessarily identify the 'responsible DNO' in any event. We suggest that this is deleted and the first two MPAN digits are used instead.</p>	<p>The Working Group reviewed the comments received and noted the following:</p> <p>General – it was noted that the prescribed period was introduced to avoid repeating the timescales in every clause in which they are referenced.</p> <p>Clause 30.5A.4 –already discussed</p> <p>Clause 30.5B.2 – to be discussed against a later question</p> <p>Clause 30.5E.1 – the group agreed not to amend this clause.</p> <p>Part 4 Table –to be discussed against later questions</p>
SP Distribution / SP Manweb	Having participated in the Working Group we have raised points previously regarding the legal text. Our concerns are mainly around the reporting requirements for the DNO and the 2% threshold, all of which will be raised in this consultation.	To be discussed against later questions

UKPN	<p>The letting off of the excess for the SLA if the 2% volume is exceeded needs to be considered for the first 4 quarters as there will be no supplier forecast a year previously if the implementation dates are as stated. Moreover the DNOs may not know what level of resource is required until forecasts are received. We recommend that the SLAs should commence application one year after the first supplier reporting.</p> <p>We also believe Category C jobs (where the DNO deems a requirement to attend) should be included in the 2% measure because Ofgem have not differentiated those in publishing the 2% value.</p>	<p>The group agreed that there is a timing issue in that if the SLA comes in on 1 April 2015 then ideally reporting should commence on 1 April 2014, however, the change process timescales will not enable the CP be implemented by 1 April 2014. The group agreed to reconsider the CP implementation timescales</p>
Western Power Distribution	<p>Yes.</p> <p>(i) Category A situations are those where there is danger, including danger of death of or injury to persons and/or danger of damage to or destruction of property, and yet Clause 30.5A.2 condones doing nothing until the start of the next working day, or on 10% of occasions, nothing at all. This could be perceived as a rather cavalier attitude to customer safety.</p> <p>(ii) This issue has arisen by virtue of adopting the same requirement as for a blown cut-out fuse, even though there are markedly different safety connotations. Suggest the last sentence of 30.5A.2 is deleted, the definition of working hours changed to “7am – 7pm on each Working Day”, and the prescribed period for 30.5A.2 changed to “3 hours if the notification is received within Working Hours on a Working Day and within 5 hours at any other time”.</p> <p>(iii) The definition of “Safe” is the converse of a “Category A Situation”. This means that a Category A situation effectively has to be remedied during the initial visit in order to satisfy 30.5A.4, whereas the intent is just to remove the danger. Suggest this is clarified by adding the following to the definition of a Category A Situation “and which also prevents metering work from being carried out or prevents a meter from being exchanged”</p>	<p>(i) The group noted that there is a difference between supporting an activity and not imposing an SLA. There are other licence obligations which the DCUSA SLAs do not take precedence over.</p> <p>(ii) The group agreed not to amend the current text</p> <p>(iii) The group did not feel comfortable with adding the suggested wording. The group instead amended 30.5A.4 to replace “Category A situation” to “residual situation”.</p>
Organisation	Question 4. Are there any unintended consequences of this proposal?	Working Group Comments
BG	We do not believe there are unintended consequences	Noted
EDF	<p>We believe that there is an unintended consequence of this proposal created as a result of the 2% intervention rate being based on smart metering rollout forecasts. Until SMETS2 compliant meters are available in high volumes and across all meter variants, non-smart meters will continue to be installed. Smart metering installation volumes for specific geographic areas will also be driven by the availability of the relevant communications infrastructure in that area and so volumes for certain periods will be low.</p> <p>In these circumstances the forecast volumes of smart metering installations will be low, however interventions will still be required for non-smart meters, if this is not accounted for not only will Distributors breach their SLAs but customers with non-smart meters will be relatively disadvantaged in terms of the quality of service they receive from Distributors which would not be acceptable.</p>	<p>The Working Group observed the volumes for smart meters will not be a true reflection of the volume of meters being changed, due to non-smart meter installations. The group agreed that this should be considered as part of the post implementation review. ElectraLink took an action to highlight this in the DCP 195 Change Report.</p> <p>The group agreed to consider whether to</p>

	<p>Another unintended consequence of this proposal is that by creating a reporting requirement that is different to other similar reporting requirements that Suppliers are required to meet, that the various reports will not align and that there will be confusion as to what the projected rollout volumes will be. We would urge the working group to consider re-aligning the reporting requirements detailed in the legal text with other existing reporting requirements.</p>	remove "smart" from the reporting requirements, i.e. require reporting on all roll outs forecast, not just smart meters
ENWL	<p>There are a number of unintended consequences due to this change proposal were the volumes are unknown which will affect SLA's;</p> <ul style="list-style-type: none"> • aborted visits; • second visits required; • incorrect allocation i.e. Cat A instead of Cat B resulting in other distribution work being affected • Customer unwillingness for visit (be it to have the work done or not requiring a smart meter. We have instances of four attempts to gain access); • Suppliers target the same location at the same time in DNO's area, and • Suppliers cherry pick the easiest areas with the more difficult ones being at the end of their programme. 	The group noted these are scenarios which will potentially occurred and agreed that there were no amendments that should be made to the legal text in relation to them.
Eon	Not that we are aware of.	Noted
Northern Powergrid	<p>There is a risk of supplier's exceeding their centrally developed installation volume forecasts with supplier's local operational/delivery managers still expecting the SLA performance to be maintained by Distributors. While it may be possible for Distributors to maintain performance in response to short-term unexpected volume increased in some cases, we would propose that the change (if accepted) be supported by appropriate internal communications by parties to provide clarity and manage expectations.</p> <p>There is also the risk of Distributor resource issues being created by miss-reporting category B jobs as category A events by supplier's agents and sub-contractors, for example in the pursuit of meter installation productivity against potential performance incentives.</p> <p>Assuming the change proposal is accepted we would suggest that local operational managers (for both Supplier's and Distributor's) are properly briefed on the scope and key features (and limitations) of the new arrangements in order to minimise unnecessary escalation events (including proper briefing on the application of defect categories).</p>	Noted
SSE Supply	We are concerned that volumes of interventions may occur beyond the ability of the network owner that result in large numbers remaining unfixed. With the threshold at 2% aggregated across suppliers, some areas that have not been subject to network investment could be disadvantaged by the SLA's being dropped.	Noted

SSE Distribution	We are not aware of any.	Noted
SP Distribution / SP Manweb	None that we are aware of.	Noted
UKPN	None identified	Noted
Western Power Distribution	See response to Q3 above.	Noted
Organisation	Question 5. Do you consider that the proposal better facilitates the DCUSA objectives? Please provide your rationale	Working Group Comments
BG	<p>1. The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks.</p> <p>This proposal will ensure that network issues reported to the network companies are rectified within agreed timescales therefore contributing to the efficiency of the network.</p> <p>2. The facilitation of effective competition in the generation and supply of electricity and (so far as is consistent therewith) the promotion of such competition in the sale, distribution and purchase of electricity.</p> <p>This proposal will help suppliers in managing customer expectations with regard to fault resolution. This will assist those suppliers who are carrying out meter exchanges to support specific customer propositions and therefore help to improve competition in the electricity supply market.</p> <p>3. The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences</p> <p>Licence Condition 21 "The Distribution Code" places obligations on licensees to ensure licensees operate their network in an efficient, co-ordinated and economical manner. The proposed changes will assist network owners in ensuring these obligations are met.</p>	Noted
EDF	We agree with the assessment of the proposer for this CP that the proposal better facilitates the DCUSA objectives 1, 2 and 3 above, and with their reasoning for this assessment.	Noted
ENWL	<p>We believe that the introduction of this change proposal will better facilitate the general objectives as stated below:</p> <p>Objective.1 – this will be better facilitated by the introduction of planned roll out volumes of smart</p>	Noted

	<p>meters by suppliers thereby allowing the distributor time to plan resources in an efficient, co-ordinated and economical manner.</p> <p>Objective 2 – this will be better facilitated by assisting in the customer experience to the benefit of all suppliers so they can provide more bespoke services on the back of the smart meter roll out.</p> <p>Objective 3 – this will be better facilitated by improving the process and timescales associated with complying with our licence to operate an efficient co-ordinated network.</p>	
Eon	We are in agreement with view of the proposer of this change and their assessment against the DCUSA objectives.	Noted
Northern Powergrid	<ol style="list-style-type: none"> 1. Yes I agree with this. The SLA's should ensure that there are robust processes in place to rectify defects in a timely manner, thereby supporting efficiency and co-ordination. 2. Yes, if the arrangements help support Suppliers in delivering efficient metering installation and their smart roll-out obligations (assuming this in turn would help improve consumer confidence and promote competition in supply). 3. Yes we are committed to keeping our network as safe and running as efficiently as possible. 4. Not necessarily. While the arrangements would provide clarity to DCUSA parties as to their responsibilities, in the context of this change proposal, we note that this change proposal further broadens the scope of DCUSA. No doubt the Panel and Secretariat will remain vigilant in relation to maintaining efficiency in the administration of the agreement. 	Noted
SSE Supply	We agree that this covers the requirements.	Noted
SSE Distribution	We broadly agree with the consultation document in relation to better facilitating DCUSA Objectives 1 and 3, as the CP is intended to require and promote efficient working arrangements between Parties in the context of the Smart Metering programme roll-out.	Noted
SP Distribution / SP Manweb	In general, the proposal better facilitates the DCUSA objectives below.	ElectraLink took an action to confirm which objectives with respondent
UKPN	<p>Efficiency and Economy for the DNO's is impacted by accurate forecasting of the suppliers rollout plans, accuracy in the reporting of defects and the ability to recover inefficient costs caused by the customer or meter operator through the supplier.</p> <p>The consistency of the SLA application supports balanced service levels across suppliers from the requirement for interventions. However, where appropriate this should not affect the drive by suppliers and DNO's to improve their customer experience.</p> <p>We would welcome thoughts on the impact of the regulation on Cross Border Exchange and how the SLA facilitates this objective.</p>	The Working Group observed that Smart relates to an EU objective and thus Objective five may be better facilitated too. KW took an action to look into this further so that it can be captured in the DCP 195 Change Report.

Western Power Distribution	Yes.	Noted
Organisation	Question 6. The proposed implementation for the DCP 195 legal text is six months after Ofgem approval. Reporting will then commence the first quarter after this date and the SLAs will apply from 1 April 2015. Do you agree with these proposed dates?	Working Group Comments
BG	We agree with the proposed implementation dates	Noted
EDF	As stated in our responses to earlier questions EDF Energy's preference is for a single set of forecasting reports to be used for all purposes for which this data is required, and for the timescales for that reporting to be aligned. We understand that the DCC is likely to require forecasting reports for their rollout planning purposes and we urge the working group to ensure that there is consistency with this reporting in regards to both the details of the reporting and the timescales to minimise complexity and cost, and ensure that the reports used by all parties for effectively the same purpose are aligned. It would not appear reasonable, or sensible for Suppliers to have to provide the same data multiple times.	The Working Group noted that the intention is that there should be alignment, only there will be additional information.
ENWL	When you factor in the rest of this change process, even with a fair wind this decision is likely to be made at best in May 2014. It will mean we only receive reports at post code/out code level from suppliers in December 2014. A lead time of only 9 months which is less than we would have anticipated.	The Working Group considered whether the timescales should be adjusted to enable a bedding in period. Supplier attendees were asked whether they needed six months' notice from Ofgem approval or whether they could produce the reports sooner. In response, it was highlighted that Telefonica and Arqiva had not provided a go-live date and thus post-code outcode forecasts cannot be provided at present. It was suggested that the January 2015 post implement review could assess the granularity and timescales of the reporting, i.e. whether postcodes are available by this point. Suppliers would use best endeavours. The working group reviewed the timescales and the amended timescales are provided in the DCP 195 Change Report.
Eon	Yes	Noted

Northern Powergrid	Yes, Northern Powergrid expects that this should give us sufficient time to get our resources ready and robust supporting processes implemented.	Noted
SSE Supply	Yes we agree that this is a suitable period for all parties to get this embedded.	Noted
SSE Distribution	Yes, but qualified by and subject to our comments in response to question 11b.	Noted
SP Distribution / SP Manweb	Yes	Noted
UKPN	The SLAs should apply at least one year after the supplier forecast reporting commences. Otherwise, the 2% matter does not work, as identified above.	Noted
Western Power Distribution	WPD agrees with the implementation date for the legal text and for Supplier reporting to commence the first quarter after this date. Distributors will only be able to report whether they have met or failed to meet the SLA four quarters after receipt of the first Supplier report, by virtue of Clause 30.5D.1. Consequently the SLAs and Distributor reporting should commence four quarters after receipt of the first Supplier report or 1 April 2015, whichever occurs the later.	Noted
Organisation	Question 7. It is proposed that the 2% threshold is based against the quarterly forecasts of smart meter roll outs. The legal text currently specifies that this should use the forecast from 4 quarters ago. How far in advance should this forecast be base-lined to enable adequate resourcing by distributors?	Working Group Comments
BG	Currently the driver for smart metering installs is largely consumer led therefore the volumes can vary from planned at very short notice. As the roll-out progresses we expect this to change and the volumes will become more fixed per DNO area. We would suggest that initially suppliers should be able to amend their forecast 1 quarter ahead to give DNOs the most accurate view of what we are likely to install.	The Working Group noted the respondents preference for 1 quarter
EDF	It must be recognised that the Supplier forecast reports will be based on our best assessment of the volume of intended installations taken at a point in time; however there are a number of factors that will affect the accuracy of these forecasts over time. Customer churn rates and changes in the geographic distribution of our customer portfolio will have a significant impact on Supplier forecasting. The availability of the DCC's communications network will also be a significant factor for Suppliers. Our forecasts will be based on DCC projections on SMWAN coverage and will be impacted by any changes in that coverage. It also needs to be recognised that a mass rollout on this scale is not something any Supplier has experienced before and so any forecasting, especially in the initial period, may be subject to some inaccuracy.	The Working Group noted the respondents preference for 2 quarters

	On this basis we do not believe that, in the initial period at least, any forecast that is more than two quarters ahead can be regarded as a firm and accurate baseline for resourcing. However by the time of peak rollout it should be possible to attain a higher level of accuracy further ahead.	
ENWL	<p>To understand when the roll out forecast should be base-lined we need to have an agreed approach of providing the forecasts. This was discussed by members at the ENA SMSG in December, resulting in a letter to Energy UK at the time, that the minimum roll out information requirements should be provided on a rolling basis:</p> <ul style="list-style-type: none"> •Earlier than 18 months in advance of mass roll-out commencement: – Numbers of installations planned for each year of the roll out period within each DNO boundary. •18 – 12 months in advance of mass roll out commencement: Numbers of installations planned each quarter by first two letters of postcode (e.g. “NE”) within each DNO boundary. •12 months in advance of mass roll-out commencement: Numbers of installations planned each quarter by postcode out code e.g. “NE16” within each DNO boundary <p>If it is agreed that Suppliers will provide the above information then it should be base lined at 18-12 months when volumes and location are provided to enable DNO’s to ensure adequate resourcing is in the area.</p> <p>As stated above, the legal text doesn’t facilitate this, neither does the amount of time remaining do this unless the implementation is brought forward and the legal text amended to accommodate the above, or suppliers provide this information outside of this change proposal.</p>	The Working Group noted the respondents preference for 18 months (six quarters)
Eon	Four quarters is fine for the first report but this should shorten to 2 quarters as the roll out progresses and DNO resourcing is up to speed with the roll out.	The Working Group noted the respondents preference for 4 quarters then shortened to 2
Northern Powergrid	We would be looking to get resources in place based on the Suppliers proposed programmes. We would support the use of the forecast from 12 months ago to ensure that adequate resources are in place provided Suppliers believe the forecast to be sufficiently accurate.	The Working Group noted the respondents preference for 4 quarters
SSE Supply	This is difficult to baseline due to many unknowns until the point of installation. We have no idea at present on the scale of customer uptake or the signal strength for example. The volumes of interventions required are as difficult to forecast by the network operator. We recognise that this information is useful to allow forward planning involving recruitment and training for the networks. Once we have better visibility of known issues combined with a campaign management tool then we can respond to this in an educated manner.	The Working Group noted that no preference was given
SP Distribution / SP Manweb	Four quarters should be a reasonable time limit to enable the DNO’s to adequately resource up to cope with the demand. However, there appears to be no guidance as to how DNO’s cope should the aggregated Supplier roll out plans lead to a situation that is technically unachievable based on resources	The Working Group noted the respondents

	<p>funded via RIIO ED1, etc.</p> <p>Also, in contrast - we have concerns regarding what would happen if Supplier roll out plans are not in line with what they have forecast (the number of installations is a lot less than forecast). For example, a DNO could resource up in line with the supplier roll out plans submitted but then may find that the reality of the situation is not the same – we risk having a workforce idle.</p>	preference for 4 quarters
SSE Distribution	In our view a forecast baseline using 2 quarters of 'quality' data would be a better approach.	The Working Group noted the respondents preference for 2 quarters
UKPN	<p>Our preference is for 6 quarters.</p> <p>4 quarters at post code outcode is the minimum that should be used. It is expected that a further period of post code reporting would be appropriate to support resource forecasting.</p>	The Working Group noted the respondents preference for 6 quarters preferred (minimum of 4)
Western Power Distribution	<p>Given the lead time to train, safety rule authorise and otherwise mobilise additional resources anything less than 12 months advance notification is, in WPD's opinion, expecting too much.</p> <p>It should be borne in mind that the Suppliers' quarterly forecast is for a whole distribution license area rather than by postcode outcode. Distributors will have to manage the deployment of staff to particular geographic areas at much shorter notice, and potentially to have to deal with changing Supplier forecasts in the same timeframe is too demanding.</p>	The Working Group noted the respondents preference for 4 quarters
<p>The Working Group noted that 4 quarters was most preferred period, although some respondents had a preference for more quarters and some had a preference for less. It was observed that the accuracy of the data from the Suppliers will be greater the closer it is to the implementation date, thus data four quarters out will be less accurate than that provided for one quarter out. A Working Group member highlighted that Suppliers as well as DNOs will be resourcing to forecasted levels and thus will want to have a reasonable confidence level in the forecasts. Reasonable notice is needed to have the appropriate amount of trained staff in the appropriate locations. It was explained that it can take up to 18 months to train an individual, thus you need to start the recruitment process far in advance of the period the postcode outcode reporting covers.</p> <p>The group discussed whether forecasting by postcode outcodes is needed or whether the area code would be sufficient. (IP = area code, IP1= District (i.e. Outcode), IP1 2 = Sector and IP1 2AA = full post code)</p> <p>It was observed that there are a very large number of postcode districts. It was suggested that Quarters 1 and 2 could be reported by Outcode and Quarters 2 and 3 could be by area code. In response, it was highlighted that to provide this much information a great deal of work for the Supplier. Whether this was sufficient information would also depend on the size of the area, for example, a London area will be significantly smaller geo-graphically than one in the north of Scotland.</p> <p>It was highlighted that in terms of whether the SLA is met, the postcode outcode level is irrelevant as the SLA is measured at the aggregated volume level. In response, it was observed that the postcode outcode information is requested not just for the SLA measurement purpose but to aid Distributors in their planning.</p>		

Based on its discussions, the group agreed as a compromise position reporting should be at postcode outcode level for two quarters and at DNO area level for a further four quarters. This was the unanimous view of all Working Group members present. KW took an action to speak to those DNO's not present at the meeting to determine their views on the proposed approach.		
Organisation	Question 8. If the 2% intervention rate was found to be systematically wrong for a given region or for all regions, how might that be dealt with?	Working Group Comments
BG	Our understanding is that distributors are fully funded under their price control on a unit cost basis for intervention rates up to 10% thereafter the unit cost is reduced to take account of economies of scale. If the intervention rate was found to be wrong for a given region we would expect the distributor to put plans in place to secure additional resource to ensure jobs reported over and above the 2% are rectified in a timely manner. The distributor can also apply for a derogation until sufficient resource has been put in place to meet the SLA.	The Working Group noted the respondent's view that this was not a funding issue. Attendees agreed with this view. The Ofgem representative highlighted that the 2% level has been chosen as a base level using data provided to Ofgem by market participants.
EDF	As noted above EDF Energy has significant concerns about the 2% fault rate and the impact that this will have where this is found to be insufficient. We believe that a robust and timely mechanism is required to identify as quickly as possible where the 2% rate is not correct, and for the affected Distributor(s) to seek additional funding (or a decrease in funding) from Ofgem to support a more realistic fault rate. We note that as part of RIIO-ED1 Ofgem has set out proposals to allow networks to recover costs for attending 2% of smart metering installations, with a provision to review and increase this funding requirement if intervention rates increase. We are concerned that as the proposal is currently worded the DNOs could have an increase in their revenue to fund additional interventions that does not translate into a higher standard of service for customers. We believe that there should be a clear mechanism so that if the DNO revenue is increased there is an automatic updating of the SLAs to reflect this.	The Working Group noted the response.
ENWL	If the 2% intervention rate was systematically wrong for all regions then we would expect this rate to be reviewed within the industry. We would expect the actual data collated would be used to provide a realistic intervention rate. It may turnout that the intervention rate may be different for the regions due to the complexities of their network. This would have to go through relevant DCUSA change management process as well as opening discussions with the Authority over funding arrangements. If the intervention rate was wrong for one region then we would expect this to be raised between the relevant parties in the first instance prior to any escalation to the DCUSA Panel. It could be that the Suppliers have targeted one area of that region that has caused the issue, or the area has a high volume of older buildings. Ultimately all stakeholders need to work together to deliver a successful smart meter roll out.	The Working Group noted the respondent's suggestion that the DCUSA level be amended if needed. It was highlighted that a DCUSA Change Proposal could be raised to progress this if the need is identified. An attendee suggested that it may be worthwhile having a standing group to keep the area under review.
Eon	It is likely to be. Distributors will have the best view of where the likely faults on their network are based on the following;	The Working Group noted the response.

	<ul style="list-style-type: none"> a) age of network b) last Distributor visit to site c) DNO action on reporting of fault on D0010's d) Investment plans for their Network. 	
Northern Powergrid	Initially we would deal with this through direct discussions with Suppliers and then take a view from there. The absolute volumes of defects in any period and individual supplier's actual roll-out profiles will be just as important for resource implications as the intervention rate.	The Working Group noted the response.
SSE Supply	We suspect from our intelligence that 2% will be underestimated in some areas. The concern for us is the impact to the end user initially in delaying their installation while they are still warmed up to having a smart meter. If the figure is dramatically wrong then this could have an adverse impact on our targets of installations by 2020. Our license conditions could be adversely affected if networks have not carried out the interventions in a timely manner that prevents us from achieving our obligations. DNO's can challenge their funding through the OFGEM mechanism if they require additional staff.	The Working Group noted the response.
SSE Distribution	If the intervention rate is systematically wrong, derogation(s) could be applied for, potentially until such time as agreed variations of the DCUSA can be achieved via a Change Proposal.	The Working Group noted the response.
SP Distribution / SP Manweb	SP Energy Networks believe that potentially the intervention rate should not be set until further analysis has been carried out. Potentially question 9 below should have been asked in advance of setting the 2% rate	The Working Group noted that the figure agreed with Ofgem had been used.
UKPN	DCP if all regions, derogation if isolated regions, changing the intervention rate would need a lead time of at least a year to enable appropriate resourcing.	The Working Group noted the response.
Western Power Distribution	<p>Is there a need to do anything?</p> <p>Clause 30.5D.1 releases the Distributor from its SLA obligations in the event of a defect rate above 2%. Clause 30.5E.1 requires Distributors to prioritise the resolution of Category A & B Situations where the SLA has not been met ahead of any new Category B ones. This ensures that all Category A & B Situations will be addressed.</p> <p>The Regulator has decided to fund Distributors assuming a 2% defect rate. In the event that the intervention rate differs from this there is a volume driver mechanism for Distributors to retrospectively recover the additional costs that have been incurred or to return funds to customers (as appropriate). The volume driver mechanism is an annual review.</p>	The Working Group noted the response.
Organisation	Question 9. Based on your experience, can you provide the DCP 195 Working Group with any information that would aid the group in determining the network fault rate as a percentage of smart meter installations?	Working Group Comments

BG	We have analysed the number of category A and category B interventions that we reported in 2013 and have assessed that the intervention rate as a percentage of actual meter exchanges ranges from 0.3% to 1.2% across all DNOs	The Working Group noted the response. The respondent highlighted that these figures are based on current activities and there may be certain types of property not included within these figures as they have not yet been visited.
EDF	<p>We would be able to report the current fault rates that are being experienced when undertaking site visits, the fault rate for legacy meter installs should be the same as for smart meter installs as the impact of an issue with the Distributor equipment would be the same in either case. It should also be possible to provide specific reporting on fault rates for smart meter installs based on our trial activity. We have generated this reporting for the purposes of this consultation but would be happy to provide that information separately for consideration by the Working Group.</p> <p>As a Meter Operator we would be able to provide reporting on the levels of incidents of each type in relation to the number of site visits undertaken for those areas we operate in, and as a Supplier we could seek to gain this information from our appointed agents. Alternatively a data request could be issued to the Association of Meter Operators which might then be able to provide a more comprehensive view of actual fault rates across all GSP Group areas.</p>	The Working Group noted the response.
ENWL	At this point in time insufficient information is available to determine fault rates across the area.	The Working Group noted the response.
Eon	<p>This is hard to say as network faults are not fundamentally linked to Smart meter installations. However we can see from the number of D0135's sent for all metering jobs the following:</p> <ol style="list-style-type: none"> 1. Fault rate appears to be approximately 6% of all jobs 2. 26% of D0135's and Cat A's reported have had a D126 returned. And 74% have had no response. 29% of Cat A jobs have not been responded to with a D126. 3. Of the D0126's that are responded to 50% take longer than 40 days to be returned. 4. Where a D0135 has been rejected it appears there is an even split between those that have been correctly rejected, this is where the D0135 is incorrect, and those that have been incorrectly rejected, this is where the reason for rejection by the DNO is incorrect and should have been processed. Where DNO's are rejecting there is no consistency between DNOs or within individual DNO companies to try and ascertain why they have been rejected. 	<p>It was noted that the fault rate given is for all jobs (As/Bs/Cs and smart/dumb).</p> <p>The working group noted that these figures show that there is work to be done on how the flows are used, by those both sending and receiving them. It was observed that this can feed into the IREG discussions.</p> <p>The respondent stated that they would be happy to provide this data to the DNOs for their individual areas.</p>
Northern Powergrid	Nothing more that has been discussed previously	The Working Group noted the response
SSE Supply	From previous analysis carried out on XXXX site visits, we found the figures closer to: CAT A = 1%, CAT B = 3% & CAT C = 4%. We have plans for further site surveys to test this out.	The Working Group noted the response

SSE Distribution	We have survey data from our network areas which we are happy to make available to the Working Group. The survey was completed in 2011 and has previously been shared amongst industry parties including: DECC; other network operators and suppliers.	The Working Group noted the response
SP Distribution / SP Manweb	Smart Meter installs. D0135 defects can also be raised following a failed SMC job where the meter type is not smart or as part of a scheduled programme of asset inspections. Therefore it can make it difficult to determine the rate above accurately and further analysis would need to be carried out in relation purely to smart meter installations.	The Working Group noted the response
UKPN	Early indications suggest 2% is a reasonably sensible figure, at this time, when we analyse Cat A, B and C jobs, but there are regional differences around this across our DNOs and sub areas which support the importance of accurate advanced supplier reporting of smart metering activity.	The respondent highlighted that different suppliers have rolled out more smart meters than others.
Western Power Distribution	The defect rate has been discussed in a number of industry forums in recent years. The fact that after all these discussions, and all this time, there is still so much uncertainty, shows that there is no definitive information available to aid the group.	The Working Group noted the response
The group agreed that there was nothing in the responses to suggest that the group should move away from the 2% figure.		
Organisation	Question 10. Should Parties have the ability to refer other Parties to the DCUSA Panel for failure to meet these new obligations?	Working Group Comments
BG	Whilst this was not part of the original DCP 153 proposal we agree that there should be some form of recourse should parties not be meeting their obligations under the DCUSA. We agree with the proposal that parties should be able to refer other parties to the DCUSA Panel for failure to meet their obligations.	The Working Group noted the response.
EDF	It should be recognised that failure to meet these obligations will result in a poor customer experience and poor customer service. EDF Energy believes that Parties that are adversely impacted by the failure of other Parties to meet their obligations under the DCUSA need to have the ability to have this addressed in an effective way. As a minimum EDF Energy would support providing Parties with the ability to refer other Parties to the DCUSA Panel for failure to meet these new obligations.	The Working Group noted the response.
ENWL	The question here is whether we believe that this should be classed as a material breach. If so we should follow the Event of Default process already contained within DCUSA rather than developing something specific to this change proposal.	It was suggested that if the legal text in its current point is so that Parties are not in breach of the DCUSA immediately if they fail to meet the SLA.
Eon	It is unclear what action the DCUSA Panel can take as they are an administrative function.	The Working Group noted the response. It was highlighted that the Panel can suspend the Party's right to vote on Change Proposals. It was suggested that the legal text could give the Panel greater powers to request a remedy plan from the Party.

		Counter to this it was suggested that there should be a bilateral process.
Northern Powergrid	Northern Powergrid believes if one to one discussion doesn't alleviate the problem then this could be the right way to go. We would not seek to escalate such matters initially and would hope that two way discussions between Distributors and Suppliers would alleviate any problems (including any 'teething' problems).	The Working Group noted the response.
SSE Supply	Yes, we do not agree with the legal text where the aggregated volumes of installations can affect a supplier who has operated within their predictions.	The Working Group noted the response.
SSE Distribution	We agree with this aspect of the CP but with the qualification that Distributors must also be able to refer a Supplier Party if they repeatedly issue poor quality forecast information or create any additional unnecessary work which impacts upon a Distributor's ability to meet the SLA. If there is an ability to refer Parties to the DCUSA Panel, this should be conditional on reasonable endeavours having been exercised to resolve the matter through bilateral discussions and referral should not be an automatic first step.	The Working Group noted the response.
SP Distribution / SP Manweb	Parties should be able to raise any issues that they may be experiencing at the relevant forum, although it would depend on what assistance the DCUSA panel can offer as to whether it is worthwhile to do so?	The Working Group noted the response. It was observed that the Panel has the remit to establish groups related to DCUSA matters.
UKPN	This should be dealt with between the parties. UKPN are committed to developing resourcing strategies to fulfil the efficient discharge of responsibilities and would raise resourcing issues with individual suppliers which might include joint working arrangements for customer experience benefits	The Working Group noted the response.
Western Power Distribution	Parties already have this ability under DCUSA Clause 58: Disputes. DCP195 does not appear to be proposing changes to Sections 1B & 3 of DCUSA and consequently it is unclear what the Panel could do with any referral other than to invoke the dispute procedure. The dispute procedure is deemed to be sufficient for all the other DCUSA obligations and the consultation document has not outlined why it may be excessive or inadequate for the new ones.	The Working Group noted the response.
It was noted that the consensus view is that there should not be an escalation process to the panel and instead there should be co-operation between Parties, i.e. DCP 195 should not be dealt with any differently to any other DCUSA obligations. It was observed that this view may change following the post implementation review.		
Organisation	Question 11a. Do you agree with the proposal that where Distributors are not meeting the SLAs they could potentially be required to submit a recovery plan to the DCUSA Panel?	Working Group Comments
BG	Yes	The group noted that it has been agreed that there will not be an escalation to the panel process.

EDF	EDF Energy agrees with this proposal, given the impact that the failure to meet the SLAs has on our customers, on the cost effectiveness of our smart metering rollout and on our ability to meet our rollout obligations we believe that Distributors need to robustly address underperformance and monitoring and enforcement by the DCUSA Panel will help to ensure that this is achieved.	
ENWL	We do agree with the proposal that a recovery plan should be submitted to the DCUSA Panel but which party produces this plan is dependent on whether the SLA is not being achieved due to the fault of the Distributor or Supplier(s). The Supplier(s) agents could be raising invalid requests or a number of Suppliers have targeted a certain area within the Distributors area. Therefore we would expect the parties to discuss and agree prior to a plan having to be produced for the DCUSA Panel.	
Eon	It is unclear what action the DCUSA Panel can take as they are an administrative function	
Northern Powergrid	Not initially as there will be ways to address specific issues locally without need to develop written recovery plans, but Northern Powergrid accepts that such plans could prove necessary should other steps not deliver improvements within acceptable timescales.	
SSE Supply	Yes, this should be a detailed improvement plan.	
SSE Distribution	We agree with this aspect of the CP.	
SP Distribution / SP Manweb	Submitting a recovery plan may be a good idea although the issue is that potentially the situation will already be resolved by the time the recovery plan is submitted due to the time difference.	
UKPN	Would it not be preferable to address this if needed in the light of experience, rather than formalise it at this stage? DNOs also have an expectation that supplier's plans will be fluid and changeable.	
Western Power Distribution	Please note response to Q10. This proposal effectively predetermines the recommendations from the disputes process and it probably should not be constrained in this way.	
Organisation	Question 11b. Do you have any comments on what the qualifying criteria should be (for example, the legal text proposes failure to meet the SLA for two successive quarters)?	Working Group Comments
BG	We think it would be appropriate to be able to refer a party if they failed their obligations in any 2 of a 5 quarter rolling period. This would enable a party to refer, for example, if it regularly failed in a certain quarter every year.	The group noted that it has been agreed that there will not be an escalation to the panel process.
EDF	EDF Energy broadly agree with the proposal in the legal text, any period of underperformance longer than this will start to impact on our ability to achieve our rollout targets.	
ENWL	We agree with the legal text that the qualifying criteria for failure to meet the SLA for a licence area should be two successive quarters.	

Eon	A failure is a failure and needs to be taken on its own merit taking into account the effect of the failure.	
Northern Powergrid	No	
SSE Supply	We believe there should be some form of financial incentives where a recovery plan has been put in place and not achieved. There is a risk to customers through lost time from work that may result in them becoming disengaged.	
SSE Distribution	We generally agree with the proposed criteria but we would also suggest that the 'two successive quarters' measure should start from the July – September 2015 quarter to enable all parties to bed in the obligations and mechanisms.	
SP Distribution / SP Manweb	Failure to meet the SLA for a licence area for two successive quarters (6 months) would be a reasonable time scale for a breach of the SLA. However, as above, by the time the breach has been identified it may already be rectified.	
UKPN	It should be appropriate, as it is sufficient time to enable DNOs and suppliers to react to initial SLA output results and subsequently ascertain the effectiveness or otherwise of resourcing actions.	
Western Power Distribution	Please note response to Q10. There is currently no pre-qualifying criterion which must be satisfied before the dispute procedure can be invoked.	
Organisation	Question 11c. Do you believe that Suppliers should be required to submit recovery plans where their reporting is not in line with the defined rules or where mis-reporting is having an impact on the DNOs ability to meet the service level?	Working Group Comments
BG	Suppliers should be required to submit forecasts of smart meter installs in line with DCP 195 proposals. These forecasts should be in line with the forecasts submitted to Ofgem which will be subject to regulatory scrutiny under the suppliers' licence obligations.	The group noted that it has been agreed that there will not be an escalation to the panel process.
EDF	EDF Energy recognises that Suppliers have a responsibility to support Distributors through accurate reporting and that underperformance in this area should be addressed. However the points made in response to question 7 regarding the constraints that exist around reporting accuracy, at least in the initial rollout period, also need to be taken into account. We would also note our comments regarding the benefits of a single set of reporting on the accuracy of that reporting.	
ENWL	This is similar to our answer for question 11a. We believe that Suppliers who are not reporting in line with the defined rules or misreporting which has an impact on the DNO should at first be discussed and resolved by the impacted parties. If agreement cannot be reached then it should be raised to the DCUSA Panel.	
Eon	What is the basis of the recovery plan? Supplier reporting is their best view of the likely roll out in the	

	future. The suggestion is to build in a 2% error rate or the SLA is waived. The biggest impact on the ability of a Distributor in not being able to correct faults on their network is in not understanding the characteristics of their networks not meter change roll out predictions.	
Northern Powergrid	Northern Powergrid would refer to our answer in 11a above	
SSE Supply	Yes, we are happy to provide evidence as there are many fluid reasons that can affect our projections being achieved. These can include no access, customer uptake, lack of signal, etc.	
SSE Distribution	We agree with this aspect of the CP, particularly as one of the stated reasons for the Authority's decision to reject DCP153 was inadequate incentives for accurate forecasting by Suppliers. As stated elsewhere, we are not convinced that this deficiency in the previous CP has been suitably addressed by this CP.	
SP Distribution / SP Manweb	<p>SPEN believes that Suppliers should be required to submit recovery plans where their reporting is not in line with the defined rules or where mis-reporting is having an impact on the DNOs ability to meet the service level. If the roll out volumes are a lot higher, Suppliers must be able to review their forecast in line with current run rates.</p> <p>As discussed in questions 7, we also have concerns regarding what would happen if Supplier roll out plans are not in line with what they have forecast (the number of installations is a lot less than forecast). For example, a DNO could resource up in line with the supplier roll out plans submitted but then may find that the reality of the situation is not the same – we risk having a workforce idle.</p>	
UKPN	It is important to ensure that suppliers are motivated to get the flow reporting as accurate and appropriate as possible, particularly avoiding inappropriate emergency requests and customers to request follow up, duplicating requests.	
Western Power Distribution	<p>Please note response to Q10.</p> <p>This proposal effectively predetermines the recommendations from the disputes process and it probably should not be constrained in this way.</p>	
Organisation	Question 12a. The Working Group is recommending that the time frame in paragraph 30.5B.1 of the legal text (relating to notifying the Distributor of Category B situations) be 5 WDs, what are your views on what this timeframe should be?	Working Group Comments

BG	We agree with the proposal to notify the Distributor within 5 working days	The group noted the respondent's preference for 5 working days
EDF	EDF Energy believes that this timeframe should be 10 working days; this time period would be in line with other requirements that exist under the BSC for sending dataflows resulting from a site visit. Suppliers will be incentivised to send the dataflows as quickly as possible due to the impact on the customer experience, however there is no clear need to mandate a timescales for this that is shorter than other industry standards.	10 working days.
ENWL	The Distributors clock starts on receipt of the flow therefore whether we receive the request up to 5 or 10 Working Days of the fault being identified we still have to make an appointment to visit the site in the required timescales. We will have no knowledge as to whether they break this service level unless the customer rings us directly.	It was agreed that you would not know.
Eon	I believe 5 WDs is a maximum it is likely to be much sooner than that our D0135's are sent the same day.	The group noted the respondent's preference for 5 working days or sooner
Northern Powergrid	Northern Powergrid believes 5 working days is reasonable	The group noted the respondent's preference for 5 working days
SSE Supply	Under the current manual processes we believe that 10 days is more suitable at present until we have rolled out an automated system. We agree with the aspiration to achieve 5 days. We are raising jobs as soon as they come in and not holding during the period.	The group noted the respondent's preference for 10 working days
SSE Distribution	We do not agree with this part of the CP and would request that the time frame is amended to 2 or (at most) 3 Working Days in this context. Our concern is that a period of 5 Working Days (the traditional working week) may well lead to 'batch' behaviours, which would not provide an efficient flow of referrals to the DNOs or be in the best interests of the overall customer experience.	The group noted the respondent's preference for 2 or 3 working days. The respondent highlighted their concern that operatives will batch instructions
SP Distribution / SP Manweb	SPEN are happy with a 5 day timescale for Cat B's notifications.	The group noted the respondent's preference for 5 working days
UKPN	This is acceptable but it is expected that systems will in most cases enable this to be same day – we should also consider how customer experiences should include appointments from site.	The group noted the respondent's acceptance of 5 working days
Western Power Distribution	WPD supports this timeframe. We have experienced some instances of Suppliers storing up notifications and sending them in a single batch. Whilst we recognise that there will always be an element of this, the five working day requirement effectively limits the size of the batch, consequently making it less onerous to deal with.	The group noted the respondent's support for 5 working days
The Working Group noted that whilst some support longer timescales and others support a shorter timescale, the majority are comfortable with a 5 Working day timescale. It was suggested that there should be contact between suppliers and distributors at a local level to facilitate a smooth process.		
Organisation	Question 12b. The view of the Working Group is that the timescales in 30.5C.1 of the legal text	Working Group Comments

	(relating to notifying the Distributor of Category C situations) should be 10 Working Days. Do you agree with this timeframe?	
BG	We agree with the proposed timescale for reporting category C situations	The group noted the respondent's support for 10 working days
EDF	EDF Energy agrees with this timeframe; this time period would be in line with other requirements that exist under the BSC for sending dataflows resulting from a site visit.	The group noted the respondent's support for 10 working days
ENWL	As Category C situations do not have a SLA for appointment and completion as this is planned work for Distributors and has not prevented the meter being fitted, it makes no sense to have a different timescale. As soon as the supplier knows that they need to send a flow they should do so. Once again we will have no knowledge of whether this is achieved or not so we don't understand what value it is adding.	The group noted the respondent's support for 10 working days
Eon	I believe 10 WDs is a maximum it is likely to be much sooner than that.	The group noted the respondent's support for 10 working days
Northern Powergrid	Northern Powergrid believes 10 working days is reasonable.	The group noted the respondent's support for 10 working days
SSE Supply	This is courtesy information for the DNO's that we are providing and the expectation is not that these will be acted on in any hurry. 10 days is reasonable.	The group noted the respondent's support for 10 working days
SSE Distribution	We believe that 10 Working Days is appropriate in this context.	The group noted the respondent's support for 10 working days
SP Distribution / SP Manweb	SPEN believe that a Cat B and Cat C should be treated the same for consistency and ease of process – 5 working days seems reasonable.	The group noted the respondent's support for 5 working days
UKPN	This is acceptable but it is expected that systems will, in most cases, enable this to be same day.	The group noted the respondent's support for 10 working days
Western Power Distribution	WPD suspects that in practice Suppliers & MOPs will employ the same business process for both Category B & C Situations. Whilst WPD has no objection to this timeframe, it wonders whether it should be aligned with the Category B one i.e. set at 5 working days, for the same reasons as per Q12a.	It was explained by the respondent that they do not object to 10 working days.
It was noted that the majority support 10 working days. The group agreed that they were happy to stick with this value.		
Organisation	Question 13. Clause 30.5B.2 of the proposed legal text states that where a notification of a Category B incident is received it should be rejected if telephone details are not provided unless the customer and their contact details are on the priority services register, This will ensure that the Distributor is able to contact the customer for all accepted flows. Do you agree with this approach?	Working Group Comments
BG	We agree that in the majority of cases contact details should be provided. However there will be	The Working Group noted the response. It

	<p>instances where the customer either refuses to provide consent for these details to be shared or does not have a telephone. These instances should be stipulated when returning the flow so that the DNO can still act in these instances</p>	<p>was explained by the respondent that they are not sure that a blanket reject process should be used, this will add time to the process.</p> <p>It was observed that the DTN cannot deal with @ signs thus email addresses cannot be provided. It was noted that there has previously been a consultation on this area and it was concluded that the ability to use the @ sign on the DTN should not be progressed. ElectraLink took an action to seek out information on this consultation.</p> <p>It was noted that the distributor would need to write to the customer in this circumstances. The response to written letter was highlighted to be very poor.</p> <p>In instances with where the customer has stated to the Supplier that they do not wish to be contacted by phone then the Supplier cannot pass the telephone number on.</p> <p>It was suggested that just providing an address is not adequate, a name is needed and a means of contacting.</p> <p>It was noted that the Supplier wants the job to be done, therefore, they have the incentive to provide all of the information that they possibly can.</p> <p>The Working Group noted that sending a letter to the customer means that it is less likely that the customer will respond in time for the appointment to be made within the SLA timescales. It was noted that the legal text states that reasonable endeavours should be used.</p>
EDF	EDF Energy do not agree with this approach, notifications must not be rejected on the basis of a missing	The Working Group noted the response.

	<p>telephone number. It needs to be recognised that for some customers contact by telephone would either not be appropriate or it may not be their preferred method of receiving communication. In these cases customers should be contacted by post using the address details provided, or possibly via e-mail (if an e-mail address were provided as part of the additional information on the D0135 dataflow).</p> <p>We believe that Suppliers will aim to provide telephone contact details where this is possible but this cannot be mandated as alternate methods of contacting the customer are available and may be more appropriate for that customer.</p>	
ENWL	<p>Currently there is no provision to reject the D0135 dataflow by using the D0126 dataflow, the data item J1823 Asset Condition Clearance Code which is in the D0126 only has two values C for Cleared and D for Disputed. Therefore for the D0135 to be rejected there is a requirement to add a new value of R for Rejected to the J1823 – Asset Condition Clearance Code data item.</p> <p>If there is the facility to reject the D0135 via a D0126 then we would agree that the D0135 should be rejected if a telephone number has not been provided in all cases.</p> <p>Whilst it is understandable for Distributors to check their Priority Services Register to see if a customer is on the list we would not want users (or their agents) to stop populating this information just because they may believe that the customer is on such a list. If User's (or their agents) do so we would want a change to the D0135 to include a flag to identify Priority Customers and Special Needs customers to enable Distributors to filter these out and find the contact information from their relevant databases.</p> <p>In order to ensure that we will not be in breach of DCUSA should this CP be accepted it is essential that a MRA DTC CP is raised for the inclusion of a 'reject' within the D0126 and this be approved in advance of the Authority's decision. We would be comfortable to raise and sponsor this change proposal.</p>	The Working Group noted the response.
Eon	No. A customer may request contact by other means than telephone. As long as there is a means for customer contact these should not be rejected.	The Working Group noted the response.
Northern Powergrid	Yes, we believe that Suppliers will have, or can readily obtain, the necessary telephone contact details (including for their own appointment setting) and the details should be made readily available to the Distributor. Contact by telephone is likely to be the most efficient way to arrange appointments for the majority of customers.	The Working Group noted the response.
SSE Supply	We do not see this as an issue as we will share any contact information we hold for that consumer.	The Working Group noted the response.
SSE Distribution	We cannot agree with this proposal as it stands, as we believe that it conflicts with the provisions of the MRA. Alignment with other codes requires further consideration by the Working Group, to avoid unworkable obligations being created.	The Working Group noted the response.

	An alternative arrangement may be for flows which do not include telephone details to be accepted by the Distributor provided that such instances were completely excluded from SLA measurement.	
SP Distribution / SP Manweb	<p>SPEN agree that if telephone numbers are not provided then the Category B job should be rejected – unless the MOP has reported vulnerability on the D0135 dataflow. The customer may not be on the Priority Services Register, if the Supplier has not notified the DNO so this alternative approach may resolve any potential issues. The MOP could report on the D0135 in the additional text field of vulnerability identified at property when taking the contact details.</p> <p>It should be noted that rejecting Cat B incidents due to no telephone number was raised at IREG previously - IREG were against this approach.</p>	The Working Group noted the response.
UKPN	<p>Yes, the absence of accurate contact details would slow the appointment process down and increase the administration costs. Writing to addresses with no customer name or telephone number has proved extremely ineffective. The distributor should have the right to reject the flow but should not be obliged to do so as they may hold contact details already.</p> <p>A more effective solution would be to make the Customer Name and Contact Tel Number mandatory fields with an option for both additional tel no's (Home and Mobile)</p>	The Working Group noted the response.
Western Power Distribution	<p>Clause 30.5B.2 refers to “contact details” rather than “telephone details”. In WPD’s opinion the former is a slightly vague term and should be replaced with a more precise one e.g. address, landline telephone number, mobile telephone number etc.</p> <p>It is reasonable to reject the notification where no contact details are provided, however, matters are less straightforward where only an address has been provided. In these instances there is the wherewithal for the Distributor to contact the customer, but the ability to meet the appointment SLA will be severely compromised. Likewise, if the customer does not respond promptly to a letter, the ability to meet the resolution SLA will also be jeopardised. In these instances the notification should either be rejected or the SLA should be deemed to have been met (i.e. introduce another 30.5D.* clause). WPD suspects the latter approach would be perceived more favourably than the former.</p>	The Working Group noted the response.
Organisation	Question 14. Should the Distributor manage the process for making the appointment with the customer, or should the supplier or their MOP agent take responsibility for dealing directly with the customer?	Working Group Comments
BG	We believe the Distributor should manage the process for making the appointment with the customer.	The Working Group noted that the majority

	However the Distributor must keep the supplier informed of the proposed date or any subsequent amendments to that date	of respondents to this question suggested that the distributor should manage the process.
EDF	EDF Energy believes that the Distributor should manage the process for making the appointment with the customer. At the point that an incident is reported to the Distributor they become responsible for managing the relationship with the customer for the rectification of the issue with their equipment. Requiring the Supplier or their MOP to handle this on behalf of the Distributor will add additional complexity to the process, and almost certainly additional cost, as any solution to this would require additional interfaces to be developed by Suppliers and Distributors. There is no clarity as to how this might be achieved in a way that provides a good customer experience, and how issues like the need for Distributors to contact the customer to re-arrange appointments might be achieved.	The Working Group noted the response.
ENWL	We believe the Distributor should manage the appointment booking process to enable the relevant skill set required to carry out the work is appointed to the right work request.	The Working Group noted the response.
Eon	The only practical method of appointment making is by the party attending. The MRA has just been modified from the supplier asking for a specified date to the Distributor agreeing the date and giving the supplier sufficient notice to carry out their obligations. This would seem to be the most sensible approach	The Working Group noted the response.
Northern Powergrid	Northern Powergrid believes it should definitely be the Distributor's responsibility to make the appointment.	The Working Group noted the response.
SSE Supply	We believe that this will be more effectively managed if the DNO liaise directly with the end user	The Working Group noted the response.
SSE Distribution	The Distributor must be able to manage customer appointments – any other arrangement would be unworkable and most likely create adverse customer experience and publicity for the roll-out programme.	
SP Distribution / SP Manweb	The Distributor should manage the process for making an appointment with the customer. This gives DNO's the required control and avoids any issues between Supplier / DNO / Customer.	The Working Group noted the response.
UKPN	It is the supplier's responsibility to report the issues found and capabilities developing on both parties will drive the customer appointment process – both parties will seek an effective customer experience with an aligned process. Suppliers have previously identified their motivation to own and manage the customer experience. It feels like the topic should be subject to further consideration – the solutions might be different for Cat A and B as opposed to Cat C which would be expected. to be DNO led. We can see advantages of the MOP on site arranging an appointment or the supplier arranging it on their customers' behalf if the capability exists.	It was noted that UKPN was the only respondent to have a different view. The respondent explained that Suppliers have previously stated that they want to "own" the customer. Also in terms of customer experience, when you have a supplier or Meter Operator on site, the right thing to do would be to try to make the appointment on site but the system does not allow this a

		present as Distributor and Supplier systems are not integrated.
Western Power Distribution	<p>Customer appointments are subject to guaranteed standards of performance and consequently Distributors and Suppliers should remain responsible for making appointments for their own staff / contractors / agents.</p> <p>WPD would not wish to consider departing from the current approach without a re-evaluation of the guaranteed standard obligations, specifically, clarity of the ramifications on one party following a failure by the other.</p>	The Working Group noted the response.
Organisation	Question 15. Suppliers: would you find it useful to be notified of work that has been carried out on Category C incidents? DNOs: what issues do you see in notifying Suppliers where work has been undertaken on a Category C incident?	Working Group Comments
BG	We would find it useful to be notified of work carried out with regard to Category C incidents.	The Working Group noted that the respondent would find it useful.
EDF	<p>EDF Energy would find it useful to be notified of work that has been carried out on Category C incidents. While a Category C incident would not ordinarily prevent a meter from being installed it may be the case that local working practices or individual technical competencies might prevent specific operatives from working on equipment with an outstanding Category C incident (such as a metal clad cut out). Knowing when this had been resolved would be useful.</p> <p>Additionally, although the Category C codes are intended to be for information only, and on the whole they are, sometimes defects that prevent metering work being undertaken have to be reported as Category C as that is the only valid code available. The codes can be reviewed and revised (an exercise is currently being undertaken to update the codes based on real experience of using them), but there should be the fall back option of knowing when a category C defect has been corrected.</p> <p>As we would expect all Category C Incidents to be recorded and tracked by Distributors we do not believe that sending a dataflow as a result of the resolution of that incident would create any significant additional cost or complexity for Distributors.</p>	The Working Group noted that the respondent would find it useful.
ENWL	<p>We believe in order to complete the process and respond to the D0135 flow once Category C work has been completed it makes sense to send the D0126 flow. Category C work is planned work and has not prevented the meter from being installed and therefore we would not expect any follow-up or SLA's associated to Category C requests.</p> <p>However this conflicts with the MOCOPA document 'Guideline for Service Termination Asset Reporting by Telephone and use of the D0135 and D0126' which states that if a Category C has been reported via a D0135 that there is no response by the means of a D0126. Therefore the relevant changes would have to be made to this document to ensure that all codes, agreements and guidelines are aligned.</p>	The working group noted the respondent's comments. It was noted that changing the D0126 was not within scope at the moment.

Eon	No. However we currently are receiving a D0126 for some Cat C jobs.	The Working Group noted that the respondent would not find it useful.
Northern Powergrid	From a DNO perspective Northern Powergrid anticipates that such notification would probably be via a data flow, so we would have to ensure that our notification processes were robust for Category C notifications as well as for Category A and B jobs.	The Working Group noted the response.
SSE Supply	We do not see any benefit here	The Working Group noted that the respondent would not find it useful.
SSE Distribution	As a DNO, we cannot see any value in Suppliers receiving this information. As this information flow would incur needless work and costs for Distributors, in our view it is a wasteful inefficiency which would detract from the positive aspects of the CP. We believe that it fails to better facilitate DCUSA Objective 1 and we therefore urge the Working Group not to progress this to the final proposals.	The Working Group noted the response.
SP Distribution / SP Manweb	Due to the sheer volume and nature of the Cat C's reported, we feel that there would be no value in responding via a D0126 to Suppliers once Cat C issue has been rectified.	The Working Group noted the response.
UKPN	Change to existing process but not insurmountable. Cat C as a condition category suggests that the smart meter installation is unhindered so not sure what value it would add to suppliers. In this category there is also similar non supplier driven work that is not categorised for which DNO's will carry out a similar activity with the same resource which are not subject to D0126 flows.	The Working Group noted the response.
Western Power Distribution	It is unclear for what purpose Suppliers would want this information as Category C Situations do not prevent metering work from being carried out or prevent a meter from being exchanged. In anticipation of significant volumes of Category C Situations and the fact that remedial work may not necessarily take place straightaway (i.e. forms the basis of a future work programme), WPD will not be creating work instructions on receipt of a dataflow, merely logging them in a spreadsheet. A consequence of this is that any future sending of a D0126 dataflow would have to be a manual rather than automated exercise. This is not something that WPD would wish to entertain, given the anticipated volumes.	The Working Group noted the response.
It was noted that the majority of distributors and suppliers (including Npower who did not submit a response) do not feel that there would be merit in this suggestion. It was agreed that no further action on this suggestion should be taken.		
Organisation	Question 16. Do you believe that any amendments are needed to the legal text to further accommodate IDNOs?	Working Group Comments
BG	We believe that the proposed SLAs should apply equally to IDNOs as they do DNOs	The Working Group noted the response.

EDF	EDF Energy does not believe that any further amendments are required to accommodate IDNOs.	The Working Group noted the response.
ENWL	We are having difficulty understanding this particular clause. Why should they be released from their obligations just because the main distributor has? They have their own network and assets and as such should be measured against them. They should be reporting separately on the calls and data flows they receive and as such whether they meet their SLAs. That said we would be very surprised if they had asset condition concerns on their network.	The Working Group noted the response.
Eon	No	The Working Group noted the response.
Northern Powergrid	No	The Working Group noted the response.
SSE Supply	None	The Working Group noted the response.
SSE Distribution	Whilst we believe that this question should largely be responded to by IDNOs, the Working Group should also note that there are significant numbers of embedded DNO networks in addition to embedded IDNO networks. As such, the arrangements proposed by the CP must accommodate all such scenarios.	The Working Group noted the response.
SP Distribution / SP Manweb	No	The Working Group noted the response.
UKPN	It is unclear why the IDNOs are being linked to the DNOs in terms of forecasting and SLAs.	The Working Group noted the response.
Western Power Distribution	WPD has no comments.	The Working Group noted the response.
The Working Group noted that IDNOs have new networks and thus the incident rate in their areas is likely to be lower. The group agreed that no further amendments were required to the legal text in this area.		
Organisation	Question 17. In your view, should the DCP 195 legal text include any clauses regarding costs associated with activities to be recouped from the Supplier (such as the charge that may be applicable if the customer aborts an appointment) or does this sit outside of the scope of DCP 195 and if so please state how it should be addressed?	Working Group Comments
BG	We do not believe that costs associated with activities to be recouped from the Supplier should be addressed within the scope of DCP 195. The issue of cost recovery from suppliers will exist regardless of whether SLAs are put in place to address category A and B issues and therefore should be addressed	The Working Group noted the response

	under a separate piece of work.	
EDF	<p>We believe that this is outside of the scope of DCP 195. As previously noted once the issue has been raised the requirement to manage the relationship with the customer sits with the Distributor. They should therefore be responsible for providing a positive customer experience and incentivised to take appropriate actions to minimise the likelihood of missed appointments.</p> <p>We would also note that customer service is a central theme of RIIO-ED1 with the Distributors incentivised to provide good customer service and experience, with Distributors subject to incentive regimes for providing good customer service. It would therefore appear that this is already being addressed by the RIIO-ED1 process.</p>	The Working Group noted the response
ENWL	<p>Obligations on Distributors in respect of attendance to support meter installation are clear and there is an expectation that Suppliers and DNOs work so as to minimise abortive visits.</p> <p>Where appointments are made with customers to do work then we do not believe it is appropriate to expose individual customers to the costs of any subsequent cancellation. To do so would risk the installation programme. Such costs however should be deemed efficiency and allowed as part of the DNO smart meter cost uncertainty mechanism.</p>	The Working Group noted the response
Eon	No. If a customer aborts an appointment made with the DNO it does not make any sense to charge the cost to the Supplier. The appointment is to rectify a fault with the Distributors network. The fault is not of the making of the Supplier and is part of the day to day management of a distribution network.	The Working Group noted the response
Northern Powergrid	Northern Powergrid believes that the application of specific charges e.g. for aborted appointments can be dealt with effectively by individual Distributors under the current provisions of DCUSA with respect to charging. If the scope of DCP 195 is fundamentally to establish an SLA (in return for Supplier volume forecasts) the recovery of costs would be appear to be out of scope of the original intent of DCP 195. However, we believe Ofgem has made it clear that additional costs for defect resolution driven by Suppliers should be funded by Suppliers and not customers in general via Use of System charges. A potentially useful place for setting out such charges may be the Distributor's Miscellaneous Charges Statement. We would ask the working group to check that the drafting of the DCP 195 legal text does not prevent a Distributor from applying appropriate charges under DCUSA clauses 19 'Charges' and 22 'Transactional Charges' and that the drafting does not prevent a Distributor from including appropriate visit charges in its Relevant Charging Statement e.g. its miscellaneous charging statement. Such checks should provide reassurance for Ofgem and Distributors and provide clarity for Suppliers on appropriate cost recovery.	The Working Group noted the response
SSE Supply	We do not believe that we should be held accountable if an end user fails to keep an appointment.	It was noted that this was more in relation to a particular charge. The Ofgem representative highlighted that where the

		<p>cost is driven up then the driver of those additional costs should bear those costs.</p> <p>It was suggested that there is a need to agree what is reasonable and what is not. In response, it was highlighted that Ofgem had provided guidance on this already. Ofgem took an action to provide clarification on its guidance, for example, what are the types of additional costs that can be charged to suppliers (e.g. meter board replacements, external meter covers, out of hours visits, aborted visits)?</p>
SSE Distribution	We do not feel that cost recovery issues belong within a CP which essentially concerns service delivery levels and information flows. We see this as a matter for Distributors to address within their Miscellaneous / Transactional Charges arrangements.	The Working Group noted the response
SP Distribution / SP Manweb	SPEN agree that there should be a mechanism for cross charging between Suppliers and DNO's although we have concerns as to how any disputes would be resolved and how this will be enforced – is this something that can be drafted into the via the legal text and enforced by DCUSA?	The Working Group noted the response
UKPN	<p>Yes this is within scope.</p> <p>It should be agreed that the distributor can charge for mis-reporting, out of hours and aborted visits, meter boards, actions to enable replacement of external cabinets etc,</p> <p>These should be charged to the supplier.</p>	The Working Group noted the response
Western Power Distribution	<p>Clause 30.5E.4 includes recovery of costs from Suppliers in the event of misreporting and consequently the principle of including such matters seems to be established.</p> <p>Regulatory guidance has been to base costs on normal hours working. Accordingly DCP195 will need to address additional costs for out of hours working/accelerated delivery/abandoned call outs/defects that are not DNO responsibility, and so on.</p> <p>WPD suggests that Clause 30.5E.4 is re-worded to bring in scope all costs which are to be recouped from Suppliers.</p>	The Working Group noted the response
Organisation	Question 18. Do you have any comments on the format and column headings of the Supplier Forecast Roll out plans reporting table, as provided in the DCP 195 legal text (Part 4 of the proposed new Schedule)?	Working Group Comments
BG	If reports are submitted centrally the body collating these forecasts could write out each quarter will	The Working Group noted that the difficulty

	details of the actual quarters and years completed in the column headings. This would remove the possibility of confusion as to what volumes need to be provided in what columns.	is that the forecast needs to be a rolling one that moves each quarter, which is difficult to accommodate in the DCUSA.
EDF	As stated in our responses to earlier questions EDF Energy's preference is for a single set of forecasting reports to be used for all purposes for which this data is required. We understand that the DCC is likely to require forecasting reports for their rollout planning purposes and we urge the working group to ensure that there is consistency with this reporting to minimise complexity and cost, and ensure that the reports used by all parties for effectively the same purpose are aligned.	It was highlighted that DECC only want annual volume by DNO area which does not provide sufficient granularity for the purposes of the SLAs.
ENWL	Yes. We do not like the optionality here regarding GSP Group or postcode out code. We expect to receive the out code for our GSP group, and expect to see it for a full years worth of roll out at that level; We do not expect to see any roll out plans for other GSP groups. What is 'balance of remaining year'? It would be helpful to have in the table the supplier who is populating the data.	It was noted that there is not optionality with regards to GSP group and postcode out code.
Eon	No	Noted
Northern Powergrid	No comments at this stage	Noted
SSE Supply	We do not believe that the level of granular detail is achievable. Due to the lack of knowledge on potential customer uptake or other issues that may prevent a successful installation, our plans may need to be very fluid. We are happy to provide robust numbers in a geographic area based on manpower availability and achievable volumes per day. We do not believe that DNO's work at postcode outcode level for programming any more than we do. As more intelligence is gained and campaign management tools improve then it may be feasible to achieve better granularity.	Noted
SSE Distribution	We believe that the Part 4 table should provide six quarter forecasts rather than four. The first four quarters (1 to 4) should provide information to the full postcode 'Outward Code' (i.e. area and district) level whereas quarters 5 and 6 would only be to the area letter code level. Beyond quarter 6, the forecast would be at DNO Licence holder level.	It was noted that the first comment has been discussed already. It was suggested that it would not be possible to do it by MPAN as the actual appointments will not have been made when the forecasts are produced.
SP Distribution / SP Manweb	No	Noted
UKPN	Issue that it doesn't roll so the middle balancing column varies in volume each quarter.	The Working Group noted that the middle column will vary between 1 and 3 quarters. This is intentional to allow the later columns

		to relate to whole years.
Western Power Distribution	<p>WPD is:</p> <ul style="list-style-type: none"> unclear about the purpose of the column “balance of remaining year” concerned that it will only get 6 months prior visibility on a postcode outcode basis unsure what benefit is gained from Q1, Q2 & Q3 breakdown on a GSP Group basis (Q4 is required for 30.5D.1 purposes) <p>WPD suggests the table is amended along the following lines:</p> <ul style="list-style-type: none"> “balance of remaining year” changed to “2015” Q1, Q2 & Q3 columns greyed out on GSP Group rows <p>Q3 & Q4 columns made clear on Postcode Outcode rows</p>	The group agreed to remove balance of the remaining year from the legal text.
The Working Group discussed publishing a template spreadsheet on the DCUSA website. The group agreed with this suggestion and the legal text was updated accordingly. It was cautioned that post codes change and thus the template would become out of date and therefore the template will need to be regularly updated.		
Organisation	Question 19. Under the DCP 195 legal text it is proposed that the reports from the User (Supplier) are individually sent to each Company (DNOs). DNOs will then need to aggregate these reports from the individual suppliers. Would your preference be for there to be centralised collation of these reports?	Working Group Comments
BG	Our preference would be for these reports to be collated centrally. This would provide additional security regarding the anonymity of suppliers commercially sensitive roll-out plans	The Working Group noted the respondent’s preference for central collation
EDF	As stated in our responses to earlier questions EDF Energy’s preference is for a single set of forecasting reports to be used for all purposes for which this data is required. Our preference would be for this reporting to be submitted to a single body that would be able to collate the data submitted by all Suppliers and send the relevant data to the parties that require it, whether this is the DCC or Distributors.	The Working Group noted the respondent’s preference for central collation
ENWL	No our preference would not be for a centralised collation of the reports . Therefore we agree with the legal text with regards to the reports from Suppliers being individually sent to each DNO, and the DNO’s will aggregate these reports from the individual Suppliers.	The Working Group noted the respondent’s preference for individual collation
Eon	The obligation is for the Supplier to send the report. If Distributors choose to collate these centrally that is for them to decide and not an obligation in DCUSA.	The Working Group noted the respondent’s view that it is for distributors to decide outside of DCUSA
Northern Powergrid	Not necessarily, Northern Powergrid would be happy to accept individual supplier forecasts, at least initially. When Supplier’s forecasting has ‘bedded in’ centralised collation might add to efficiencies. We suggest this is reviewed at a later date.	It was noted that the respondent had no strong preference

SSE Supply	As a supplier we have no view on this	It was noted that the respondent had no view
SSE Distribution	No – we would prefer to receive the reports from each Supplier individually to enable us to be able to identify sources of forecasting deficiencies. This would enable us to approach the particular Supplier(s) on a bilateral basis. If unable to resolve the issues on a bilateral basis, we would have the data to support and inform a referral to the DCUSA Panel, where such an approach is justified.	The Working Group noted the respondent's preference for individual collation
SP Distribution / SP Manweb	SPEN believe that the reports should be collated centrally – this would then allow for useful analysis, reduce the risk of error and provide comfort in the validation.	The Working Group noted the respondent's preference for central collation
UKPN	Central coordination would ensure reports were timely, identifying any late responses with a link to affecting the SLA, and the aggregated amounts could also be split by supplier.	The Working Group noted the respondent's preference for central collation
Western Power Distribution	WPD would prefer for there to be centralised collation of these reports, provided that this did not introduce any substantial delay. If this approach is adopted then WPD suggests that all reporting is done this way i.e. Distributors and Suppliers only send their reports to the centralised function.	The Working Group noted the respondent's preference for central collation
<p>It was observed that if reports were collated centrally then only the central party would need to chase the data, rather than each DNO individually chasing missing data. It was noted that the view of collation differs – it could be to add all of the data up or put all suppliers into the same spreadsheet with a separate tab each.</p> <p>It was noted that DNOs could decide outside of the DCUSA if they wished to pay for a central aggregator. It was agreed that the no changes should be made to the DCP 195 legal text and DNOs could pick this outside of the scope of the CP should they choose too.</p>		
Organisation	Question 20a. A Master Registration Agreement (MRA) change has been drafted under which Distributors would be able to use a new flow to provide Suppliers and MOPs with advanced notice of the date the Distributor has agreed an appointment to complete works. This information would enable the Supplier to schedule a visit at the same time as the Distributor, which may enhance the customer experience. Do you agree such a flow should be introduced?	Working Group Comments
BG	We agree that such a flow should be introduced as this will facilitate the scheduling of a joint visit and improve the customer experience and minimise disruption for the customer	The Working Group noted that the respondent agrees
EDF	EDF Energy's longer term aspiration would be to endeavour to achieve effective co-ordination between our field operatives and those of the Distributor to minimise disruption to the customer. However we believe that the level of granularity at which Distributors book appointments (half day or all day), uncertainty about when within that band someone will attend site, uncertainty in advance about the length of time it will take to resolve an incident and a lack of effective real time communication between Suppliers/MOPs and DNOs mean that this would not be possible at this point in time. On this basis we	The respondent further explained that whilst they recognise there may be a benefit for the customer they are not supportive.

	<p>believe that the proposed flow on its own would not provide any value to our processes and we do not believe the proposed flow should be introduced at this time.</p> <p>A possible alternate option to be considered could be for the Distributor's operative to make a call to the Supplier or MOP when they attend site to indicate that they are on site and the approximate amount of time that they believe it will take to resolve the issue having done an assessment of the work required. This would then enable those Suppliers/Mops with a dynamic scheduling capability to endeavour to get their operative to site in line with the estimated completion time, minimising the amount of time the customer needs to be at home for work to be completed and optimising the customer experience.</p> <p>We would welcome the opportunity to work with Distributors further in the future to try and achieve this effective co-ordination as we believe that it is the right thing for our customers and for the smart metering programme overall.</p>	
ENWL	<p>As the MRA CP has not been issued for assessment and impact it is difficult to understand the impact of this change on our company.</p> <p>It should be noted that on occasions remedial work cannot be fixed first time therefore any other appointment by other parties may need to be aborted with little or no notice provision or at worse the party turning up and not being able to undertake the work. This would cause frustration with both parties and more importantly an inconvenience to the customer especially if their expectation was to expect a later visit that same day and they had to make special arrangements to be in attendance. We believe that this change is for the future once the industry has a better understanding of the roll-out and the volumes of Asset Condition requests and the process is embedded. The change will add further complexities at this early stage.</p>	The Working Group noted that the respondent agrees
Eon	<p>Yes this is essential and should be extended to any appointment made by a Distributor (such relocation of service) where there is a need for a supplier agent to attend. It would appear that some Distributors are using these opportunities to carry out the work of the appointed MOP so distorting competition in these areas.</p>	The Working Group noted that the respondent agrees
Northern Powergrid	<p>Northern Powergrid believes this has the potential to support the efficient delivery of customer service and we will be considering the detail via our MRA contract manager.</p>	The Working Group noted that the respondent agrees
SSE Supply	<p>Yes, we welcome a flow that better enables us to manage customer expectations.</p>	The Working Group noted that the respondent agrees
SSE Distribution	<p>No. Whilst this may initially appear to be a good idea, we do not believe that in practice it would deliver benefits as, for example, Category A matters would not be included, in-day timings of Parties are unlikely to work in a co-ordinated manner and it is readily possible that the DNO may be unable to complete the work on the particular day. We would suggest that this would most likely result in inefficiencies and it would be better for individual Parties to agree bilateral arrangements where possible without creation of</p>	The Working Group noted that respondent does not agree that data flows is the right approach

	an additional flow.	
SP Distribution / SP Manweb	No, we would oppose the introduction of such a dataflow. This flow will increase the FTE requirement by DNO's to manually issue a flow which we believe will have relatively little benefit. The likelihood of a Supplier attending as soon as the DNO has left the property would be a great customer service experience but the reality of this occurring is small, especially given the varying appointment scales including ALL DAY / AM / PM.	The Working Group noted that respondent does not agree
UKPN	It could possibly be done for Category B work. However, the fluid nature of appointments doesn't provide an effective feel about using flows – and enhancements to the customer experience – Suppliers MOPs booking appointments from site, flexibility, cold calling to fill appointments, would also undermine the approach. If it were the suppliers' responsibility to coordinate appointments the flow would not be appropriate.	The Working Group noted that respondent does not agree
Western Power Distribution	WPD has, in principle, no objections to the introduction of such a flow for Category B Situations. DCP195 currently does not include any requirement for DNOs to notify Suppliers and MOPs about appointment dates, and without this the MRA change has limited value. WPD has a slight reservation about the phrase “an appointment to complete works”. Some customer appointments will be planning visits and others may inadvertently become one in the event that the site conditions are such that remedial work cannot proceed straightaway, for example, if a road opening notice has to be issued. From an IT system and business process perspective it is not reasonably practicable to differentiate between different types of appointment (i.e. a dataflow would be sent in all instances) and consequently it will have to be at the Suppliers risk if they choose to a schedule a visit at the same time.	The Working Group noted that the respondent had no objections.
<p>The Working Group noted that this flow is out for assessment under the Master Registration Agreement (MRA) and will go for voting towards the end of April 2014. If there was no flow then Suppliers could be told about appointments via telephone or email, however, it was observed that this would not be practicable with mass rollout.</p> <p>An attendee suggested that knowing that the fault has been fixed is the key thing, whilst aligning appointments across the Supplier and DNO would be useful for the customer experience it is not the key piece of information. Counter to this a Supplier attendee highlighted that they have many customers where they are waiting for a fault to be resolved and have no visibility of when this will occur. Knowing when an appointment has been booked for will give this visibility and will help to improve the customer experience.</p> <p>It was noted that there is largely a split between DNOs and Suppliers with regards to this flow. It was suggested that the flow could be optional so that only the DNOs that wish to use it do so, with the other DNOs notifying Suppliers of appointment dates by other means. In response, it was suggested that the MRA change would be of limited value if it was optional as to whether or not to use the flow.</p> <p>An attendee proposed that a holistic cost benefit analysis of the flow should be undertaken, looking at the collective benefits and costs.</p> <p>It was suggested that to reduce the risk of DCP 195 being rejected because of this contentious area, that all legal text relating to this flow is removed from DCP 195 and</p>		

progressed as a separate CP depending on the outcome of the MRA change. An action was taken to review this suggestion once the MRA change has been further progressed.		
Organisation	Question 20b. Do you agree that DCP 195 should introduce an SLA on distributors to send this flow within a reasonable timescale of making an appointment with the customer?	Working Group Comments
BG	We agree that DCP 195 should introduce an SLA on distributors to send this flow	Noted
EDF	As detailed in our comments we do not believe that such a flow would be required. However if such a flow were to be introduced it would make sense to have SLAs in place around the timing of this flow, as there are for other flows detailed in the CP.	Noted
ENWL	Please note our response to 20a. However if there s support for such an initiative it would make sense to trigger the dataflow within 5 WD's of making the appointment, or earlier should the appointment date be within such a timescale.	Noted
Eon	Yes. with a maximum timescale of 5 WDs. Where the appointment is shorter than this is should be before the appointment date.	Noted
Northern Powergrid	Yes	Noted
SSE Supply	Yes we do.	Noted
SSE Distribution	No – see response to 20a.	Noted
SP Distribution / SP Manweb	No, please see response to 20a.	Noted
UKPN	No. It may give rise to the impression that suppliers will attend soon after the DNO visit and could raise that expectation. There may also be issues where the DNO can't complete the works in the first visit. It becomes complex if the customer wishes to change the appointment etc. Alternate solutions should be given consideration.	Noted
Western Power Distribution	30.5B.1 and 30.5C.1 requires Suppliers to send flows within reasonable timescales and in order to have parity of treatment it is not unreasonable for Distributors to have something similar (i.e. 5-10 days). The appointment may take place at very short notice in order to accommodate a customer's request. Suppliers will have to accept that they may not always receive the flow in sufficient time for them to be able to schedule a visit at the same time.	Noted
The Working Group noted that a number of respondents had suggested 5 Working Days was a reasonable time frame for notifying the appointment to rectify the fault.		

<p>The proposer of DCP 195 explained that various timescales for DCP 195A had been considered and it was felt that 2 Working Days was a reasonable period. It was observed that Suppliers would not wish to be told of site survey visits, only appointments to resolve the issue</p>		
Organisation	Question 20c. What do you believe this timescale should be set at?	Working Group Comments
BG	We believe the timescale should be set at “within 48 hours of making an appointment with the customer”	Noted
EDF	We do not have any firm proposals in this regard; however we believe that any SLA would need to give consideration not only to the date on which the appointment was booked with the customer, but also the appointment date itself. To make this flow useful it would need to be received sufficiently in advance of the appointment to enable the Supplier/MOP to be able to schedule their operative to attend. It is not clear what the lead times for Distributor booked appointments are likely to be and therefore what the SLAs might need to be to achieve this, however we can't see any reason why a Distributor would not be able to send such a flow within one or two days of agreeing an appointment with the customer.	Noted
ENWL	Please see 20b.	Noted
Eon	a maximum timescale of 5 WDs. Where the appointment is shorter than this it should be before the appointment date.	Noted
Northern Powergrid	Northern Powergrid suggests that 5 working days would be reasonable as we would probably have to give the customer 10 days' notice of any planned interruption necessary to carry out the work at the customer's premises.	Noted
SSE Supply	A minimum of 5 days notice would enable us time to send relevant flows through to any agents.	Noted
SSE Distribution	Not applicable – see response to 20a.	Noted
SP Distribution / SP Manweb	Please see response to 20a.	Noted
UKPN	This subject area needs to consider flexibility e.g. if an appointment is cancelled or changed.	It was noted that this flexibility is being built into the MRA Change.
Western Power Distribution	30.5B.1 requires Suppliers to send flows within 5 days and the timescale for Distributors should be the same.	Noted
<p>It was noted that once the appointment has been made it will be within the DNOs systems, thus 5 days may not be needed to notify the Supplier of this appointment date. The group noted that this did not come out in the consultation responses.</p> <p>It was suggested that the DCP 195A legal text should be amended to say “as soon as reasonably practicable but no later than 5 Working Days after the appointment has</p>		

been made”.		
Organisation	Question 20d. The Working Group is proposing that the obligation to send the flow would come into effect six months after the MRA change is approved, do you agree with this proposal?	Working Group Comments
BG	We agree with this proposal	Noted
EDF	As detailed in our comments we do not believe that such a flow would be required. However if such a flow were to be introduced we believe that these timings would be appropriate.	Noted
ENWL	The normal timescale, were system changes are required, is a six month lead time and since this is a new data flow it is a sensible assumption, however we must be aware that it is the next release after the six months period. As mentioned earlier it may be better to treat this as a separate change proposal after a bedding in period.	Noted
Eon	It should line up with the release date in the MRA which may be longer than 6 months.	Noted
Northern Powergrid	Yes	Noted
SSE Supply	Yes we agree	Noted
SSE Distribution	No – see response to 20a.	Noted
SP Distribution / SP Manweb	Please see response to 20a.	Noted
UKPN	No, we don't support the use of flows for this purpose.	Noted
Western Power Distribution	The change should not come into effect until the MRA change comes into effect. The effective date is likely to be different to the approval date.	Noted
The Working Group noted that the majority of respondents approved with giving at least six month's notice.		
Organisation	Question 21. Are there any alternative solutions or matters that should be considered?	Working Group Comments
BG	See comment under Q 22 below	Noted
EDF	No	Noted
ENWL	None known at this stage.	Noted
Eon	No	Noted

Northern Powergrid	No	Noted
SSE Supply	We do not consider any	Noted
SSE Distribution	We believe that there is merit in reconsidering the '2% threshold' such that rather than being based on a four quarter forecast, it could be based on the lesser of either two quarters forecast data or the actual numbers of meters installed. This would avoid issues from over/under forecasting or over/under performance.	The group agreed that there would be merit in this suggestion, i.e. that the threshold is on the lower of the forecast or the actual numbers of meters installed. So if the Supplier forecasts 100 jobs and actually only does 50 jobs, then rather than the distributor being required to do 2 interventions to meet the SLA the Distributor only had to do one. It was agreed that this suggestion should be further considered during the post approval review of the CP.
UKPN	The appointment issue would be worthy of separate consideration by customer service experts. Access to enable meter changes and interventions is a critical success factor and should be more fully considered to assess customer access improvements – for example how can the contact information and appointments be better managed.	It was noted that this area has already been considered
SP Distribution / SP Manweb	No	Noted
Western Power Distribution	Not that WPD is aware of.	Noted
Organisation	Question 22. Do you have any other comments or issues that you would like the Working Group to consider?	Working Group Comments
BG	We have received feedback from our operational contacts that a 40 day SLA for category B situations will result in a poor customer experience. The faster we can re-visit a customer whilst they are still engaged will certainly help facilitate a more efficient smart meter roll-out. The working group should consider whether a move to a shorter timescale for resolving category B situations is possible.	It was agreed that this area should be considered under the review
EDF	No	Noted
ENWL	There seems to be no opportunity to flag early that the volumes or areas being targeted are going to	It was highlighted that there is no

	<p>cause a problem in advance so that discussions can take place in an attempt to either amend the plan or smooth the impact. It seems to be we will tell you, you will respond, and if you fail tell us, and if you go above the 2% don't worry about it. Whilst this may be difficult to codify we would hope to engage with suppliers in order to improve the service to customers.</p>	<p>mechanism to prevent all Suppliers targeting the same area at once. In response, it was highlighted that DNOs will have the forecasts four quarters in advance and thus will have the opportunity to enter in to a dialogue with Supplies where problems in meeting the SLAs are envisaged.</p>
Eon	No	Noted
Northern Powergrid	No	Noted
SSE Supply	None	Noted
SSE Distribution	<p>In their decision to reject DCP153, the Authority identified that Suppliers were not sufficiently incentivised to provide accurate forecasts and we do not believe that this issue has been fully addressed so far in DCP195.</p>	<p>It was observed that it is not in Suppliers interests to be mis-reporting. Also, Suppliers will need to submit reports to DECC so will be need to ensure its forecasting is of a high standard.</p> <p>An attendee highlighted that Suppliers will have a certain number of staff which will drive the maximum number of installs that can be achieved each quarter.</p> <p>It was suggested that the post-approval review could be used to carry out a bench marking exercise to see how close actual roll out volumes are to those forecasted. It was agreed that this should be captured in the change report. ACTION</p>
SP Distribution / SP Manweb	<p>The main concern from SPEN is regarding the reporting requirements placed on DNO's drafted by the Working Group into the legal text. The sheer volume of proposed reporting will lead to a huge increase in FTE to process and will also lead to huge costs associated with system changes to accommodate.</p> <p>We would be unable to support the level of reporting proposed by the legal drafting without significantly increasing head count and redesigning IT systems. Even at the low volumes we are seeing at present, the</p>	<p>The group noted that the industry needs to work together to resolve these issues.</p>

	<p>administrative processes around the D0135 / D0126 dataflows places a huge strain on resources as it is time consuming and difficult to manage within the 40 working day target that we set internally.</p> <p>SPEN fully support the introduction of an SLA but feel that there are many issues that need to be resolved before we could support the proposal.</p>	
UKPN	<p>The D Flow process for Cat B can be restrictive providing a number of system handoffs in information flow and we suggest including an option in the legal text for different smart robust solutions that provide the data required where parties agree.</p>	<p>It was noted that the respondent was suggesting that it should say in the legal text <i>using the D0135 "or as agreed by the Parties"</i>, this would give the ability to use new and innovative solutions in the future. The group agreed with this approach. PW took an action to update the legal text accordingly.</p>
Western Power Distribution	<p>DNOs are obliged (under draft licence conditions and the financial model handbook) to provide data on the total number of installations of smart meters and the total number of cases where it has been required to intervene, for each licence area.</p> <p>It is likely to be problematic for all industry parties if the data (on smart meter installations) that suppliers provide to Ofgem is inconsistent with that provided by DNOs. Under the previous DCP153 proposal there was a requirement for Suppliers to retrospectively report the actual quantities of smart meters installed. This aspect has not been included in the DCP195 proposal. Without this reporting DNOs will probably have to gauge quantities by counting D0150 dataflows.</p> <p>WPD would like to see the requirement for Suppliers to report actual quantities of smart meters installed in order that we can ensure the numbers submitted to Ofgem are consistent.</p> <p>EXTRACT FROM DRAFT LICENCE CONDITION CRC 3E</p> <p>3E.1 The licensee must report on the total volume of Smart Meter Installations carried out in its Distribution Services Area in each Regulatory Year and the total number of cases where it has been required to intervene ("Smart Meter Interventions") in each Regulatory Year in accordance with the RIGs issued under standard condition 46 (Regulatory Instructions and Guidance).</p> <p>EXTRACT FROM FINANCIAL HANDBOOK SECTION 8.6</p> <p>8.6 The formula for the licensee's allowed Totex expenditure levels for Smart Meter Roll-out (contained in Part B of CRC 3E and referred to in paragraph 8.4 above) provides an updated level of</p>	<p>The Working Group did not believe this to be an issue as Suppliers will be tracking smart installs.</p> <p>It was suggested that Ofgem could take a view on the numbers installed in each DNO area. Ofgem took an action to ask internally whether or not it would be better to rely on data submitted by Suppliers on smart meters rolled out rather than from DNOs who would be relying on a proxy.</p> <p>The group agreed that there may be merit in there being an obligation on Suppliers to share their smart meter installation reports that they provide to DECC with Distributors. It was agreed that this should be further considered once the above action on Ofgem has been completed.</p>

	<p>allowed expenditure for each Regulatory Year t-2 (see note on temporal convention in chapter 1). The calculation makes use of two variables:</p> <ul style="list-style-type: none"> (a) the total number of smart meter installations in the licensee’s Distribution Services Area during Regulatory Year t-2; and (b) the number of smart meter installations where the licensee was required to intervene. <p>The numbers referred to in subparagraphs (a) and (b) will be reported by the licensee in its annual reporting to Ofgem under the RIGs.</p>	
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