

DCUSA Change Proposal Form

This form is issued in accordance with Clause 10.5 of the DCUSA.

Completed forms should be returned to dcusa@electralink.co.uk for assessment by the DCUSA Panel. Failure to complete all parts of the form may result in it being rejected by the DCUSA Panel.

PART A – Mandatory for all Change Proposals

PART B – Mandatory for Non Charging Methodologies Proposals

PART C – Mandatory for Charging Methodologies Proposals

PART D – Guidance Notes

PART A - MANDATORY FOR ALL CHANGE PROPOSALS

Document Control	
CP Status	Standard
CP Number	DCP 235
Date of submission	09 March 2015
Attachments	Attachment 1 - DTC flow D0xxx Attachment 2 – DIF 046 Attachment 3 – DCUSA SIG Meeting Minutes
Originator Details	
Company Name	Western Power Distribution
Originator Name	Graham Smith
Category	DNO
Email Address	Grsmith@westernpower.co.uk
Phone Number	01752 502208
Change Proposal Details	
CP Title	Provision of Service Termination Equipment Information
Impacted parties	Supplier, DNO, IDNO
Impacted Clause(s)	New section added to Clause 30 "Provision of Information"
Part 1 / Part 2 Matter	Part 1 Matter
Provide your rationale why you consider this change is a Part 1 or Part 2 Matter	This change will place additional obligations on Parties.
Related Change Proposals	MRA IREG ISSUE SPF0084
Change Proposal Intent	
<p>This CP proposes that Suppliers procure that their Meter Operator Agents provide service termination equipment information to Distributors, unless the Distributor has already informed the Meter Operator Agent that the information is not required.</p>	
Business Justification and Market Benefits	
<p>Distribution Businesses have been instructed by Ofgem to use the opportunity presented by the Smart Meter Rollout to gather as much information as possible about their service termination equipment in the most cost effective manner.</p> <p>In their <i>Strategy decision for the RIIO-ED1 electricity distribution price control: Reliability and safety</i> (March 2013) Ofgem state "...<i>we believe that DNOs should take the opportunity during RIIO-ED1 to build up a more detailed picture of their cut out populations, which will include knowledge of the age and type of cut outs inspected during the smart meter roll out. This</i></p>	

information should be used to identify any potential safety risks attributable to cut outs on DNOs networks".

The aim of the industry's Smart Metering Installation Code of Practice is for the customer experience of having a smart meter fitted to be positive. If some network asset information can be collected by smart meter installers it would avoid, in a lot of cases, a second visit at a later date by network operator staff, thereby mitigating the risk of further inconvenience to the Customer.

In addition to the driver above, Distribution Businesses are also conscious of the judgement in the 'RIMISSE' court case at the Technology and Construction High Court (September 2012) in which the judge suggested that Distribution Businesses needed to be more proactive with respect to the replacement of cut-outs. In order to achieve this Distribution Businesses need to obtain more data on the type and condition of their service termination assets to inform any maintenance or replacement regime that may be developed.

Lastly there is some uncertainty around the inspection regimes that Suppliers will put in place following the smart metering rollout. It may be that Suppliers move to a more risk-based approach to the inspection of their assets in customer premises (i.e. the smart meter), in which case Distribution Businesses will need to consider carefully the manner in which they discharge their obligation to inspect their own assets - in particular how this can be achieved at lowest cost and disruption to customers. As noted above, enhanced asset information would allow Distribution Businesses to consider whether a risk based approach to service termination equipment inspection and replacement should or could be implemented.

The collection of Service Termination Equipment Information by the Meter Operator Agent, while they are already on site to fit a new meter, would be the lowest cost option for collecting this data.

Proposed Solution and Draft Legal Text

It is proposed that the solution requires two new obligations to be placed in Section 2A Clause 30 of DCUSA.

One obligation would be placed on Suppliers for their Meter Operator Agent to send information to the Distribution Business using a new DTC flow D0xxx as attached.

A second obligation would be placed on Distributors to inform Users' appointed Meter Operator Agents via an amended D0215 DTC flow, on receipt of a D0170 DTC flow from a Meter Operator Agent, that the Distributor already holds the required information and that it does not need to be collected.

It is proposed that the exact legal text is developed by a working group.

The working group may also want to consider whether the change will impact the current DCUSA charging arrangements.

The working group may also want to consider whether there is scope for including "Category C Situations", currently reported on the D0135 DTC flow, in the new D0XXX flow instead of reporting them using the D0135.

Proposed Implementation Date

November 2015 or other release ahead of mass rollout of Smart Meters.

Impact on Other Codes

Please tick the relevant boxes and provide any supporting information.

BSC	<input checked="" type="checkbox"/>
CUSC	<input type="checkbox"/>
Grid Code	<input type="checkbox"/>
MRA	<input checked="" type="checkbox"/>
SEC	<input type="checkbox"/>
Other	<input type="checkbox"/>
None	<input type="checkbox"/>

If other please specify

Consideration of Wider Industry Impacts

Details of what information should be collected and the mechanism for the transfer of data have been discussed and agreed via the MRA IREG process. This has led to the development of new DTC flow D0XXX attached. There will also be a change to DTC flow D0215 to add a new "Service Termination Equipment Details Not Required" flag to the flow.

Minor change to BSCP514 & BSCP515 will also be required. This will seek to amend footnotes, on pages 22 and 9 of BSCP514 & BSCP515 respectively that restrict use of D0170 to MPANS first registered after 6th November 2008.

Environmental Impact

None

Confidentiality

None

PART B – MANDATORY FOR NON CHARGING METHODOLOGIES CHANGE PROPOSALS

DCUSA Objectives

General Objectives:

Please tick the relevant boxes. [See Guidance Note 9]

- ☒ 1 The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks
- ☐ 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
- ☐ 3 The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences
- ☐ 4 The promotion of efficiency in the implementation and administration of this Agreement
- ☐ 5 Compliance with the Regulation on Cross-Border Exchange in Electricity and any relevant legally

binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.

Detailed rationale for better facilitation of the DCUSA Objectives identified above

Improved network asset information will allow distribution businesses to better assess the need for asset maintenance and replacement and target resources where they are needed most.

PART C – MANDATORY FOR CHARGING METHODOLOGIES CHANGE PROPOSALS

DCUSA Charging Objectives

Please tick the relevant boxes. [See Guidance Note 11]

Charging Objectives:

- ☐ 1 that compliance by each DNO Party with the Charging Methodologies facilitates the discharge by the DNO Party of the obligations imposed on it under the Act and by its Distribution Licence
- ☐ 2 that compliance by each DNO Party with the Charging Methodologies facilitates competition in the generation and supply of electricity and will not restrict, distort, or prevent competition in the transmission or distribution of electricity or in participation in the operation of an Interconnector (as defined in the Distribution Licences)
- ☐ 3 that compliance by each DNO Party with the Charging Methodologies results in charges which, so far as is reasonably practicable after taking account of implementation costs, reflect the costs incurred, or reasonably expected to be incurred, by the DNO Party in its Distribution Business
- ☐ 4 that, so far as is consistent with Clauses 3.2.1 to 3.2.3, the Charging Methodologies, so far as is reasonably practicable, properly take account of developments in each DNO Party's Distribution Business
- ☐ 5 that compliance by each DNO Party with the Charging Methodologies facilitates compliance with the Regulation on Cross-Border Exchange in Electricity and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.

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Regulators.
Detailed rationale for better facilitation of the DCUSA Objectives identified above
<p>[See Guidance Note 10]</p> <p><u>Charging Objectives:</u></p> <p><u>General Objectives:</u></p>
Has this issue been discussed at any other industry forums? If so please specify and provide supporting documentation

PART D – GUIDANCE NOTES FOR COMPLETING THE FORM

Guidelines for Working Group Members and Working Group Terms of Reference are available on the DCUSA Website and provide more information about the progression of the Change Process. www.dcusa.co.uk

Ref	Data Field	Guidance
1	Attachments	Append any proposed legal text or supporting documentation in order to better support / explain the CP.
2	Part 1 / Part 2 Matter	A CP must be categorised as a Part 1 or Part 2 matter in accordance with Clause 10.4.7 of the DCUSA. All Part 1 matters require Authority Consent.
3	Related Change Proposals	Indicate if the CP is related to or impacts any CP already in the DCUSA or other industry change process.
4	Proposed Solution and Draft Legal Text	<p>Outline the proposed solution for addressing the stated intent of the CP. The Change Proposal Intent will take precedence in the event of any inconsistency. A DCUSA Working Group may develop alternative solutions. The plain English description of the proposed solution should include the changes or additions to existing DCUSA Clauses (including Clause numbers).</p> <p>Insert proposed legal drafting (change marked against any existing DCUSA drafting) which enacts the intent of the solution. The legal text will be reviewed by the Working Group (if convened) and is likely to be subject to legal review as part of its progress through the DCUSA change process.</p>
5	Proposed Implementation Date	The Change can be implemented in February, June, and November of each year or as an extraordinary release. For

		<p>Charging Methodology CPs, select an implementation date which takes in to consideration the deadlines for publishing indicative tariffs.</p> <ul style="list-style-type: none"> • Submission of Company indicative tariffs is 31 December of each year. • Final tariffs are published on 1 April of each year. <p>Please select an implementation date that provides sufficient time for the change to be incorporated into the appropriate charging model and the DCUSA in order to be reflected within the December indicative tariffs.</p> <p>Contact the DCUSA helpdesk for any further information on the releases dcusa@electralink.co.uk.</p>
6	Consideration of Wider Industry Impacts	Indicate whether this Change Proposal will be impacted by or have an impact upon wider industry developments. If an impact is identified, explain why the benefit of the Change Proposal may outweigh the potential impact and indicate the likely duration of the Change.
7	Environmental Impact	Indicate whether it is likely that there would be a material impact on greenhouse gas emissions as a result of the proposed variation being made. Please see Ofgem Guidance .
8	Confidentiality	Clearly indicate if any parts of this Change Proposal Form are to remain confidential to DCUSA Panel (and any subsequent DCUSA Working Group) and Ofgem.
9	DCUSA General Objectives	Indicate which of the DCUSA Objectives will be better facilitated by the Change Proposal.
10	Detailed Rationale for DCUSA Objectives	Provide detailed supporting reasons and information (including any initial analysis that supports your views) to demonstrate why the CP will better facilitate each of the DCUSA Objectives identified.
11	DCUSA Charging Objectives	Indicate which of the DCUSA Charging Objectives will be better facilitated by the Change Proposal. Please note that a CDCM or EDCM change may also facilitate the DCUSA General objectives.