

Part A: Generic

DCUSA Change Proposal (DCP)		At what stage is this document in the process?
<h1>DCP 304:</h1> <h2>Metering Works by Non-Appointed Meter Operator</h2> <p><i>Date raised: 11 July 2017</i></p> <p><i>Proposer Name: Kevin Woollard</i></p> <p><i>Company Name: British Gas</i></p> <p><i>Company Category: Supplier</i></p>		<p>01 – Change Proposal</p> <p>02 – Consultation</p> <p>03 – Change Report</p> <p>04 – Change Declaration</p>
<p>Purpose of Change Proposal:</p> <p>This Change Proposal seeks to widen the scope of DCUSA to allow suppliers and their meter operators to break seals and work on metering equipment at metering points for which they are not the appointed meter operator.</p>		
	<p>Governance:</p> <p>The Proposer recommends that this Change Proposal should be:</p> <ul style="list-style-type: none"> • Treated as a Part 1 matter • Treated as a Standard Change • Proceed to a Working Group <p>The Panel will consider the proposer’s recommendation and determine the appropriate route.</p>	
	<p>Impacted Parties: Suppliers, DNOs and IDNOs</p>	
	<p>Impacted Clauses: Addition of Sections 2E and 2F</p>	

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Indicative Timeline		 DCUSA@electralink.co.uk
The Secretariat recommends the following timetable:		 02074323000
Initial Assessment Report	12 July 2017	Proposer: British Gas
Consultation Issued to Industry Participants	TBC	 Kevin.woollard@britishgas.co.uk
Change Report Approved by Panel	20 September 2017	 07979 563580
Change Report issued for Voting	22 September 2017	
Party Voting Closes	13 October 2017	
Change Declaration Issued to Authority	17 October 2017	
Authority Decision	21 November 2017	

1 Summary

What?

To widen the scope of DCUSA to allow Suppliers and their meter operators to break seals and work on metering equipment at metering points for which they are not the appointed meter operator.

Why?

There are situations when it is necessary for a meter operator to be able to work on metering equipment located at metering points for which they are not the appointed meter operator.

How?

The intention will be to amend DCUSA to provide the necessary legal permissions to allow non-appointed meter operators to carry out metering works on metering equipment located at metering points.

Requested Next Steps

This Change Proposal should:

- Be treated as a Part 1 matter
- Be treated as a Standard change
- Proceed to a Working Group

2 Why Change?

The Smart Metering Implementation Programme (SMIP) is a major energy infrastructure project being led by the Department of Business, Energy and Industrial Strategy (BEIS) for the replacement or upgrade of over 50 million domestic and non-domestic electricity and gas meters by the end of 2020.

As the smart meter roll-out gathers pace meter operators are facing more and more situations when it would be beneficial to the efficiency of the programme if meter operators could work on metering equipment located at metering points where they are not the appointed meter operator.

These situations include:

- Minimal reposition of third party meter in communal meter position, to accommodate space for appointed smart meter installation;
- Work on looped neutral(s) on metering equipment;
- Work on a shared supply;
- Investigation/remedial revenue protection work; and
- Installation of an isolator;

DCP 127 (Gas First Smart Meter Installation) introduced the following new terms into the DCUSA:

1. An obligation for the gas/electricity supplier to ensure that work on electricity metering equipment at a customer's premises is only carried out by a MOCOPA accredited meter operator
2. Distribution businesses permissions for the gas/electricity supplier's agent to de-energise and re-energise a customer's electricity supply for the above scenarios
3. Electricity suppliers' permissions for the gas/electricity supplier's agent to carry out work in the above scenarios
4. Requirements for the exchange of information relating to meter safety, damage and or interference between the distributor, gas supplier and electricity supplier
5. Gas/Electricity suppliers' indemnity requirements in favour of the distributor and electricity supplier in respect of damage caused by the gas/electricity suppliers agent
6. Confidentiality restrictions that are applicable to information exchanged between gas supplier, electricity supplier and/or distribution licensee

This proposal seeks to introduce similar terms into the DCUSA but would cover two new legal relationships:

- A legal relationship between the Registered Supplier of a metering point and Supplier whose meter operator wishes to work on that metering point
- A legal relationship between the DNO/IDNO and the Supplier whose meter operator wishes to work on that metering point

The principle of meter operators carrying out work at metering points to which they are not appointed has already been approved by parties to the MOCOPA (Meter Operator Code of Practice) subject to an equivalent change being approved to DCUSA.

Part B: Code Specific Details

3 Solution and Legal Text

The draft legal text acts as Attachment 1 to this CP form. The Proposer notes that further development will need to be undertaken by a Working Group. It is intended to amend the DCUSA to add new text to Section 2 to put in place the following:

1. legal relationships between the registered Electricity Supplier of a metering point and the Electricity Supplier whose meter operator wishes to carry out metering work on that metering point
2. legal relationships between the DNO/IDNO and the Electricity Supplier whose meter operator wishes to work on that metering point

4 Code Specific Matters

Reference Documents

MOCOPA Change Proposal CP0090M

5 Relevant Objectives

DCUSA Charging Objectives	Identified impact
<input type="checkbox"/> 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	None
<input type="checkbox"/> 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)	None
<input type="checkbox"/> 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	None
<input type="checkbox"/> 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	None
<input type="checkbox"/> 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.	None

DCUSA General Objectives	Identified impact
<input type="checkbox"/> 1 The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks	Neutral
<input checked="" type="checkbox"/> 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	Positive
<input checked="" type="checkbox"/> 3 The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences	Positive
<input type="checkbox"/> 4 The promotion of efficiency in the implementation and administration of the DCUSA	None
<input checked="" type="checkbox"/> 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.	Positive

General Objective 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

This change will reduce the number of aborted meter work jobs where under the present circumstances meter operators would have no alternative but to abort the work and contact the Supplier whose metering installation they need to work on. This will increase the efficiency of smart meter roll out and the reduction in overall costs will have a positive impact on consumers.

General Objective Three: The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences

The DCUSA currently provides generic permissions from distribution licensees and registered electricity suppliers to facilitate works on electricity metering at customer premises by gas suppliers and registered electricity suppliers. This change will extend those permissions to any electricity supplier and therefore improves competition in supply of electricity which will better facilitate the efficient discharge by DNO and IDNO parties of standard licence condition 4 of the electricity distribution licence.

General Objective Five - 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

Two main EU directives are providing the drivers for smart metering in Europe, as referenced in the European Smart Metering Landscape Report:

“With the requirements of Art. 13 of the so-called Energy Services Directive (2006/32/ED, ESD) and the adoption of the Directive on the internal electricity market (2009/72/EC), it became clear that the modernisation of the European meter infrastructure and the introduction of intelligent metering systems will have to happen.”

This change better facilitates Objective five by supporting the EU’s requirement to install smart meters.

6 Impacts & Other Considerations

Does this Change Proposal impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

Ofgem have mandated that all electricity suppliers must take all reasonable steps to ensure a Smart Metering System is installed at each domestic premise by 31st December 2020.

This change will support suppliers in the achievement of supply licence condition 39.

Does this Change Proposal Impact Other Codes?

- BSC
- CUSC
- Grid Code
- MRA
- SEC
- Other
- None

Consideration of Wider Industry Impacts

N/A

Confidentiality

This proposal is not considered to be confidential.

7 Implementation

Proposed Implementation Date

Next DCUSA release following Ofgem approval.

8 Recommendations

Part C: Guidance Notes for Completing the Form

Ref	Section	Guidance
1	Attachments	Append any proposed legal text or supporting documentation in order to better support / explain the CP.
2	Governance	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. Part 1 Matter

		<p>A change Proposal is considered a Part 1 Matter if it satisfies one or more of the following criteria:</p> <ul style="list-style-type: none"> a) it is likely to have a significant impact on the interests of electricity consumers; b) it is likely to have a significant impact on competition in one or more of: <ul style="list-style-type: none"> i. the generation of electricity; ii. the distribution of electricity; iii. the supply of electricity; and iv. any commercial activities connected with the generation, distribution or supply of electricity; c) it is likely to discriminate in its effects between one Party (or class of Parties) and another Party (or class of Parties); <ul style="list-style-type: none"> i. it is directly related to the safety or security of the Distribution Network; and ii. it concerns the governance or the change control arrangements applying to the DCUSA; and iii. it has been raised by the Authority or a DNO/IDNO Party pursuant to Clause 10.2.5, and/or the Authority has made one or more directions in relation to it in accordance with Clause 11.9A. <p>Part 2 Matter</p> <p>A CP is considered a Part 2 Matter if it is proposing to change any actual or potential provisions of the DCUSA which does not satisfy one or more of the criteria set out above.</p>
<p>3</p>	<p>Related Change Proposals</p>	<p>Indicate if the CP is related to or impacts any CP already in the DCUSA or other industry change process.</p>
<p>4</p>	<p>Proposed Solution and Draft Legal Text</p>	<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.</p> <p>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	<p>The Change can be implemented in February, June, and November of each year or as an extraordinary release. For Charging Methodology CPs, select an implementation date which takes into consideration the minimum notice periods for publishing tariffs. These are:</p> <ul style="list-style-type: none"> • 15 months, for DNOs acting within their Distribution Services Areas; or • 14 months, for IDNOs and DNOs acting outside their Distribution Services Area. <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 in future tariffs.</p> <p>Contact the DCUSA helpdesk for any further information on the releases dcusa@electralink.co.uk.</p>
6	Impacts & Other Considerations	<p>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.</p>
7	Environmental Impact	<p>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.</p>
8	Confidentiality	<p>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</p>
9	DCUSA General Objectives	<p>Indicate which of the DCUSA Objectives will be better facilitated by the Change Proposal.</p>
10	Detailed Rationale for DCUSA Objectives	<p>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.</p>
11	DCUSA Charging Objectives	<p>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.</p>
12	Defining 'Material' for Charging Methodology Changes	<p>In respect of proposals to vary one or more of the Charging Methodologies, such proposals shall be deemed to be "material" if they might reasonably be expected to have a significant impact on the tariffs calculated under one or more of the methodologies.</p>