











DCUSA Change Declaration		At what stage is this document in the process?
<h1>DCP 297</h1> <h2>DCP Title: Network Interventions SLA Enhancement</h2> <p>Date raised: 7 April 2017</p> <p>Status of Change: <b>Standard</b></p>		01 – Change Proposal
		02 – Consultation
		03 – Change Report
		04 – Change Declaration
<p><b>Purpose of Change Proposal:</b></p> <p>The intent of DCP297 is to change the mechanism whereby DNOs are released from their obligations to meet the intervention SLA to one which is solely based on the accuracy of Suppliers smart meter roll-out forecasts.</p>		
	<p>DCUSA Parties voted on the Change Report and recommend:</p> <ul style="list-style-type: none"> <li>that the change solution is rejected</li> <li>that the implementation date is rejected</li> </ul> <p>The DCUSA Parties consolidated party votes are provided as Attachment 1.</p>	
	<p><b>DCUSA Parties voted to reject the implementation of</b></p> <ul style="list-style-type: none"> <li><b>DCP 297</b></li> </ul>	
	<p>Impacted Parties: <b>Distribution Network Operators (DNOs), Independent Distribution Network Operators (IDNOs) and Suppliers</b></p>	
	<p>Impacted Clauses: <b>Clause 30.5D.2</b></p>	

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## 1 Summary

### What?

- 1.1 The Distribution Connection and Use of System Agreement (DCUSA) is a multi-party contract between electricity Distributors and electricity Suppliers and large Generators. Parties to the DCUSA can raise Change Proposals (CPs) to amend the Agreement with the consent of other Parties and (where applicable) the Authority.
- 1.2 This change seeks to update the mechanism whereby DNOs are released from their obligations to meet the intervention SLA to one which is solely based on the accuracy of Suppliers smart meter roll-out forecasts.

### Why?

- 1.3 Reporting from the DNOs shows that actual intervention rates over the past 18 months range from between 3% to 7%. Therefore, there is the potential for between 1% and 5% of interventions would not fall under the agreed network SLA regime. The SLA has limited effect with the DNOs generally released from their obligations in every month.
- 1.4 The legal drafting of the network SLA arrangements under DCP 153 only released the DNOs from their obligations where the aggregate forecasts of smart meter roll out exceeded an agreed percentage and was not linked to the actual number of interventions reported. Although DCP 153 was rejected by The Authority in September 2013 the reason for rejection was because the threshold for releasing DNOs from their obligations was set at 115% which was considered to be in-efficient. Following rejection of DCP 153 the proposer raised DCP 195A which was approved by The Authority in August 2014 and included drafting that released the DNOs from their obligations to meet the SLAs where actual interventions exceeded 2% of the suppliers aggregated smart meter forecast.
- 1.5 DCP 297 releases the DNOs from their obligations where the actual number of smart meter installations exceeds 102% of suppliers aggregated forecasts which the proposer believes is reasonable as suppliers have some control over the accuracy of their forecasts but have no control of the actual number of interventions reported as this can be dependent on a number of factors outside of their control i.e. age of network, customer damage etc.
- 1.6 All customers and / or Suppliers who require a network intervention should have a reasonable expectation of when the DNO will attend and the DNOs have been provided funding to deliver this. This change therefore seeks to remove the cap on the percentage of actual interventions that benefit from the SLA by linking the release clause to the accuracy of supplier forecasts.

### How?

- 1.7 It is intended to amend the DCUSA to link the release of DNO obligation to meet the agreed SLAs to the accuracy of aggregate supplier forecasts by amending Clause 30.5D.2 as follows:

30.5D.2 The obligations of the Company that are subject to the Service Levels shall be construed as obligations to use reasonable endeavours to comply with each Service Level on 90% of occasions within each Quarter; provided that (where the Company is a DNO Party) if the total number of electricity smart meters installed by all Supplier Parties in the Company's Distribution Services Area during that Quarter is more than 2% above the aggregate Smart Meter Installation Forecasts across all Supplier Parties in respect of that Quarter and the Company's Distribution Services Area, then the Company shall be released from its obligation to use reasonable endeavours to meet the Service Levels, but only where the sum of notified Category A Situations and Category B Situations in that Quarter in the Company's Distribution Services Area across all Supplier Parties exceeds 2% of the aggregate Smart Meter Installation Forecasts across all Supplier Parties in respect of that Quarter and the Company's Distribution Services Area, and then only for obligations beyond that 2% level.

## 2 Governance

### Justification for Part 1 Matter

- 2.1 DCP 297 has been classed as a Part 1 Matter as it is likely to discriminate in its effects between one Party (or class of Parties) and another Party (or class of Parties), therefore, Authority consent is required.

## 3 Why Change?

### Background of DCP 297

- 3.1 On 12th February 2015, the Authority approved DCP 195A "Service Level Agreement for Resolving Network Operational Issues. DCP 195A proposed to introduce SLAs for DNOs to rectify issues reported to them by suppliers or their agents. The legal drafting of DCP 195A included a clause that released the DNOs from their obligation to meet the SLA if the number of actual interventions exceeded 2% of the aggregated smart meter roll-out forecast for a given area.
- 3.2 The Authority approval letter for DCP 195A, however stated "Under DCP195 and DCP195A, DNOs would not need to meet their SLA requirements if the sum of smart meters rolled out by suppliers, or their agents, exceeded 102% of the smart meters they had forecast for a single area in a given period." This differs from the actual drafting of the DCUSA where the release of the DNO obligation is triggered by the actual number of network interventions reported. This change seeks to make the DNO obligation to meet the SLA linked to the accuracy of suppliers roll out forecasts and remove the link to the actual number of interventions reported.

- 3.3 The Proposer believes that the fact DNOs are released from their obligation once 2% of interventions is exceeded is harmful to customers as these customers are not subject to any SLA. British Gas acknowledge that DNOs have an obligation to prioritise these customers but believe all customers should have the same certainty of when a reported intervention will be rectified.
- 3.4 Reporting on the actual number of interventions carried out by DNOs has been in place since April 2015 and the actual intervention rate varies from between 3% and 7% depending on geographic area. By linking the trigger to the actual number of interventions reported means that between 1% and 5% of customer interventions sit outside the agreed network SLAs. Therefore, the SLA has limited effect with the DNOs generally released from their obligations in every month.
- 3.5 All Suppliers who require a network intervention should have a reasonable expectation of when the DNO will attend and the DNOs have been provided funding to deliver this. Proposals for the current price control specifically refer to these SLAs when outlining the funding arrangements to support the smart roll-out. It is essential that these SLAs are effective to allow a meaningful assessment of whether DNOs have delivered their outputs, within RIIO:ED1, with regards to the smart roll-out.

## 4 Solution

### DCP 297 Assessment

- 4.1 The DCUSA Panel agreed for DCP 297 to be considered by a Working Group, the Interventions Working Group, which consisted of independent representatives from DNO and Supplier Parties and an Ofgem observer. An open invitation was extended to all DCUSA Parties and to all other interested parties to participate in this Working Group and this invitation remains open for any interested parties. Meetings were held in open sessions and the minutes and papers of each meeting being available on the DCUSA Website – [www.dcusa.co.uk](http://www.dcusa.co.uk).
- 4.2 The group noted that the purpose of the DCP was to change the mechanism whereby DNOs are released from their obligations to meet the intervention SLA to one which is solely based on the accuracy of Suppliers smart meter roll-out forecast.
- 4.3 The proposed change was seeking to amend the SLA release clause to one that is based purely on the accuracy of Supplier rollout forecasts. DNO members generally expressed concerns in regard to the proposed change, mainly for reasons of tying back the obligation to Suppliers' smart roll-out forecast figures, which they deem not to be fully accurate. During discussions, it was noted that there is an issue regarding the expectations surrounding reporting in relation to what a Supplier, Meter Operator or DNO would class as a mis-report with DNOs members suggesting that there is a high level of miss-reports.
- 4.4 The group agreed that the discussion in this area merits further consideration, and recommended that a consultation on the proposed amendments is issued.

## DCP 297 Consultation

- 4.5 On 14 June 2017, the Interventions Working Group issued a consultation on DCP 297, which received nine responses (six DNOs and three Supplier parties). The Group reviewed the responses to the sixteen questions within the DCP 297 Consultation document.
- 4.6 The consultation documentation and collated responses are contained within Attachment 4. In summary, the Group considered the below:

### **Question 1 - Do you understand the intent of DCP 297?**

- 4.7 The Group discussed intent of the change as one respondent had raised potential ambiguities between the title, purpose, summary and legal text. A member clarified that the change was proposing to release DNOs from their obligations to meet the service level where Suppliers volumes of attempted smart meter installations exceed 110% of their forecast, which would be clarified in the Change Report.

### **Question 2 - Are you supportive of the principles of the DCP 297? If not, why not?**

- 4.8 Most of the respondents were supportive of the principles of improving customer service but not in the manner proposed by DCP 297. A member suggested that misreporting of intervention requests is a big issue, believing that huge variances were being witnessed, that need to be addressed. It was noted that Meter Operators should not be looking for DNO defects with mirrors and that potentially endless intervention requests could be raised without a cap, outside of the control of DNOs. The Group agreed that Suppliers need to be involved in the training of Meter Operators to ensure reporting accuracy, with NSAP (or alternate training providers) being noted to be part of the solution to the reporting issues. All Meter Operators should be reporting interventions in line with Clause 30.5 of the DCUSA and the MOCOPA Guidance for Service Termination Issue Reporting V3.4
- 4.9 A member suggested that photos of specific interventions are reviewed to determine how a Supplier, Meter Operator and DNO would deal with the reported defect to gain consensus across the industry participants.
- 4.10 The Group agreed, in principle, that a proactive approach for Suppliers and DNOs to work together on the requirement to contact customers within ten days for a Category B case or Category A case made safe was preferable.
- 4.11 A member noted that D0150 does not include attempted installs, which can be problematic because the change talks about attempted installs which can include aborted attempts outside of the control of the DNO. The Group agreed that a forecast covering both installations and aborted installations would help with planning. Following review of the consultation responses the legal drafting of the change has been revised to be based on “actual” meter installations in a quarter

rather than attempted. This will simplify the calculation as actual meter installation volume can be monitored by counting the number of D0150s that are sent by the meter operator to the distributor.

- 4.12 The group also noted that ElectraLink already provide a report to the Interventions Working Group which provides the number of smart meters installed by GSP Group area for each month. The Group agreed that the ElectraLink report can be used for the purposes of calculation whether a DNO should be released from the SLA.
- 4.13 A member stated they believed that the main problem in meeting the customers' expectations was an excessively high level of misreporting by Suppliers' Agents, with one in three Category A reports in one of their areas misreported and one in four Category B reports in another area misreported. This level of misreporting is something that Suppliers have some control over and should actively seek to address; however, DNO members suggested that Suppliers have complete control. The member noted that as the proposed change to service levels places a greater obligation upon DNOs, this should be counter-balanced with an obligation upon Suppliers and their Agents to accurately report Category A and B situations. However, upon consideration, it was determined that such an amendment was outside of the original intent DCP 297.
- 4.14 The Group agreed that where a Meter Operator has a policy to not work on metal clad cut outs, then these should not be reported as a defect. Such defects should only be reported as a Category C issue as per the MOCOPA Guidance for Service Termination Issue Reporting. The Group suggested that the Meter Operative audits should cover their adherence to the service termination guidance document, which was raised to MOCOPA for consideration.
- 4.15 The Group discussed whether forecasts should include smart and legacy metering, to which it was noted that this is customer driven rollout so 100% accurate forecasts would not be able to be provided. As the New and Replacement Obligations (NRO) come into effect in August 2018, legacy metering work will reduce. The Group discussed whether the SLA should only relate to smart metering work. It was agreed that this would be unfair towards non-smart meter customers.
- 4.16 A respondent noted that the legal text as currently drafted means that once the 110% threshold has been exceeded a DNO is released from the service level for all customers. At present a DNO is released from its obligations only for interventions beyond the 2% cap. The legal text has been revised to only release the DNO from its obligation to meet the SLA for those customers who fall outside of the 2% smart meter installation forecast.

**Question 3: The Proposer has suggested the DNOs should only be released from their obligations to meet the service level where Supplier's volumes of attempted smart meter installations exceeds 110% of their forecast. Do you agree that 110% is a reasonable limit for DNOs to be released from their obligation?**

- 4.17 The Group discussed the responses to this question and noted that the 110% value was inserted in square brackets. A suggestion of 102% was raised and the legal text has now been updated to



reflect 102% being inserted within the SLA, in line with previous feedback provided by Ofgem in the Authority consent letter regarding DCP 195A.

**Question 4 - Please can Supplier respondents provide additional supporting justification for the change to address DNO concerns regarding inaccurate forecast.**

- 4.18 The Group considered the reference to regional level aggregation improving accuracy, whereby it was suggested that the accuracy does not improve on a regional level as Suppliers are overstating, to take into account their expectation to gain customers.

**Question 5 - Do you believe there will be any additional benefits to the customer from the implementation of DCP 297?**

- 4.19 The Group queried the supporting rationale provided by one respondent, in terms of whether the 38 complaints relating to dissatisfied customer amounted to a high percentage of complaints received. It was confirmed that it was a nominal percentage as the respondent subsequently confirmed that in excess of 320k electricity smart meters were installed during the period. The Group noted that it may be useful to examine the complaints.
- 4.20 Following the consultation, the respondent has provided an additional breakdown with regard to the 38 complaints as set out in the table below.

14/02/2017	Availability of appointments - DNO Cat B
26/02/2017	Availability of appointments - DNO Cat B
09/03/2017	Availability of appointments - DNO Cat B
03/05/2017	Availability of appointments - DNO Cat B
04/05/2017	Availability of appointments - DNO Cat B
13/02/2017	DNO attended but unable to complete
27/02/2017	DNO attended but unable to complete
03/05/2017	DNO attended but unable to complete
07/05/2017	DNO attended but unable to complete
07/05/2017	DNO attended but unable to complete
10/05/2017	DNO attended but unable to complete
10/05/2017	DNO attended but unable to complete
20/01/2017	Further DNO work required
26/02/2017	Further DNO work required
05/05/2017	Further DNO work required
07/05/2017	Further DNO work required
11/05/2017	Further DNO work required
11/05/2017	Further DNO work required
24/01/2017	Missed or broken appointment (DNO)
26/01/2017	Missed or broken appointment (DNO)
22/02/2017	Missed or broken appointment (DNO)



10/03/2017	Missed or broken appointment (DNO)
11/05/2017	Missed or broken appointment (DNO)
03/01/2017	No contact post DNO referral
21/01/2017	No contact post DNO referral
26/01/2017	No contact post DNO referral
17/02/2017	No contact post DNO referral
20/02/2017	No contact post DNO referral
23/02/2017	No contact post DNO referral
26/02/2017	No contact post DNO referral
20/04/2017	No contact post DNO referral
10/05/2017	No contact post DNO referral
10/05/2017	No contact post DNO referral
18/02/2017	Unhappy with DNO appointment
10/05/2017	Unhappy with DNO appointment
11/05/2017	Unhappy with DNO appointment
12/05/2017	Unhappy with DNO appointment
15/05/2017	Unhappy with DNO appointment

#### Question 6 - How does the impact of aggregated forecasts and churn affect the ability for DNOs to comply with the SLA?

4.21 The Group noted that UKPN's response clearly captured earlier concerns raised by DNOs regarding inaccurate forecasts and the impacts of aggregated forecasts and churn affecting the DNOs ability to comply with the SLA.

#### Question 7 - What impact does incorrect defect reporting by Meter Operators have on the DNOs ability to comply with the SLA?

4.22 The Group noted the responses received in relation to this question.

#### Question 8 - Do you believe the accuracy of the aggregated forecasts should be measured?

4.23 The Group discussed the responses received to this question. It was noted that all aborted installation attempts would also need to be captured in accordance with the legal text. The DNO members present noted that unless aborted installs were included they may never be released from their SLA obligations as their only measure is via the D0150. A member noted that all Category A and Category B interventions would need to be added to the number of smart meter installations in order to calculate the total number of attempted smart meter installations. One member noted that the Change Proposal seeks to address an issue that didn't currently exist, and didn't currently have a high level of customer complaints.

4.24 The Group noted that some Suppliers persist in not providing rollout profiles, which means that DNOs do not receive a view of Suppliers rollout forecasts beyond a two-year period which is pivotal

to enable optimal resource planning. On the contrary, it was noted that the majority of the Large Suppliers provide their rollout profiles, which is expected to cover the vast majority of customer installs. It was also noted that BEIS reporting templates are being used rather than DCUSA templates.

**Question 9 - What do you believe is a reasonable intervention rate to be included within the SLA, based on the intervention rates that have been witnessed?**

- 4.25 The Group noted that the condition of the network does not directly correlate with the high levels of interventions reported due to the large number of misreports witnessed. However, there was a disagreement in the Working Group regarding the scale of misreports being received by DNOs. The DNOs present raised concerns with the assessment being undertaken by the Meter Operative on site.
- 4.26 The Proposer noted that a specific figure had not been defined because the intent of the change was to move away from a cap being imposed on intervention requests.

**Question 10 - Do you believe there will be any unintended consequences of the implementation of DCP 297?**

- 4.27 The Group noted the responses received to this question and the suggestion raised by one member that the change would dis-incentivise Suppliers to accurately report and forecast.

**Question 11 - Are there any alternative solutions or matters that should be considered? If yes, please describe these.**

- 4.28 The Group considered each of the alternative solutions and matters provided, including the suggestion of a sliding scale mechanism as opposed to a static 2% intervention rate. It was agreed that this idea could be discussed upon further definition and research. If this alternative solution was to be progressed this would need to form part of a new Change Proposal as this proposal would not fall within the original intent of DCP 297.

**Question 12 - Do you foresee any system changes being required to implement DCP 297?**

- 4.29 The Group noted the responses with no further discussion.

**Question 13 - The proposed implementation date is the first standard release following Authority consent, do you agree with this? If not, why not?**

- 4.30 The Group noted the responses with no further discussion. Following review of the consultation responses the proposed implementation date has been revised to the November 2018 DCUSA release.

**Question 14 - Do you agree that DCP 297 better facilitates the DCUSA Relevant Objective 1? If not, why not?**

4.31 The Group noted the responses to this question, with a majority suggesting that DCUSA Relevant Objective 1 was not better facilitated by DCP 297.

**Question 15 - The proposed implementation date is the first standard release following Authority consent, do you agree with this? If not, why not?**

4.32 The Group noted several responses regarding the draft legal text, agreeing to take the DCP 297 legal text drafting off line for further review.

**Question 16 - The proposed implementation date is the first standard release following Authority consent, do you agree with this? If not, why not?**

4.33 The Group noted the comment raised in regard to the inconsistencies relating to the reporting of Category C interventions. The Group noted that it is a requirement within DCUSA to report Category Cs and thus should be adhered to by all DCUSA Parties.

## 5 Relevant Objectives

### Evaluation Against the DCUSA Objectives

- 5.1 For a DCUSA Change Proposal to be approved it must be demonstrated that it better meets the DCUSA Objectives. There are five General DCUSA Objectives and six Charging Objectives. The full list of objectives is documented in the CP form provided as Attachment 3.
- 5.2 A majority of the Group considers that the following DCUSA Objectives are not better facilitated by DCP 297. However, a minority of the Group (including the proposer) did consider that the following DCUSA Objectives are better facilitated by DCP 297.

**Impact of the Change Proposal on the Relevant Objectives:**

Relevant Objective	Identified impact
1. The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks	Positive & Negative
3. The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences	Positive & Negative

- 5.3 The minority view of the Working Group is that the Change Proposal better facilitates DCUSA General Objective One by ensuring that network issues reported to the network companies are rectified within agreed timescales therefore contributing to the efficiency of the network.

- 5.4 The minority view of the Working Group is that the Change Proposal also better facilitates DCUSA General Objective Three as DNOs are required to facilitate the roll-out of smart meters. DNOs are also required to operate a safe, reliable, and efficient distribution network. By amending the release clause to ensure networks are only released from their obligations to meet the SLAs where suppliers have not accurately forecast their roll out of smart meters will ensure more customers benefit from the actual SLAs

## 6 Impacts & Other Considerations

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

- 6.1 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.
- 6.2 This change will support Suppliers in the achievement of Supply Licence Condition 39.

### Consumer Impacts

- 6.3 A minority of the Group identified a positive impact on consumers from the implementation of this CP as the fact DNOs are currently released from their obligation once 2% of interventions is exceeded is harmful to customers as these customers are not subject to any SLA. It was acknowledged that DNOs have an obligation to prioritise these customers but believe all customers should have the same certainty of when a reported intervention will be rectified.

### Environmental Impacts

- 6.4 In accordance with DCUSA Clause 11.14.6, the Proposer assessed whether there would be a material impact on greenhouse gas emissions if DCP 297 were implemented. The Proposer did not identify any material impact on greenhouse gas emissions from the implementation of this CP.

### Engagement with the Authority

- 6.5 Ofgem has been fully engaged throughout the development of DCP 297 providing feedback on the proposed legal text and Change Report.

## 7 Implementation

- 7.1 Subject to the Authority's decision, DCP 297 will be implemented in the 01 November 2018 DCUSA Release.

## 8 Legal Text

- 8.1 The DCP 297 legal text acts as Attachment 2 to this Change Report.
- 8.2 The legal text amends Clause 30.5D.2 to ensure networks are only released from their obligations to meet the SLAs where suppliers have not accurately forecast their roll out of smart meters.
- 8.3 The Group is satisfied that the legal text meets the intent of the change.

## 9 Voting

- 9.1 DCP 297 change report was issued to DCUSA Parties for Voting on 22 December 2017.

### DCP 297 – Recommendation

**Part 1 Matter:** Authority Decision Required

**Change Solution – Reject.**

- 9.2 In respect of each Party Category that was eligible to vote, the sum of the Weighted Votes of the Groups in that Party Category which voted to accept the change solution was **not** more than 50% in all Categories.

**Implementation Date – Reject.**

- 9.3 In respect of each Party Category that was eligible to vote, the sum of the Weighted Votes of the Groups in that Party Category which voted to accept the implementation date was **not** more than 50% in all Categories.

DCP 297	WEIGHTED VOTING				
	DNO	IDNO	SUPPLIER	DISTRIBUTED GENERATOR	GAS SUPPLIER
CHANGE SOLUTION	Reject	n/a	Accept	n/a	n/a
IMPLEMENTATION DATE	Reject	n/a	Accept	n/a	n/a

## 10 Recommendations

### DCUSA Parties Recommendation

DCUSA Parties recommend:

- that DCP 297 should not be implemented

## Attachments

- Attachment 1 – DCP 297 Consolidated Party Votes
- Attachment 2 – DCP 297 Legal Text
- Attachment 3 – DCP 297 Change Proposal
- Attachment 4 – DCP 297 Consultation Documents