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| Company | Confidential/  Anonymous | 1. Do you understand the intent of the DCP304? | Working Group Comments |
| Response Summary:  All eleven respondents understood the intent of DCP 304, with two respondents stating that the intention had benefits to Suppliers and customers. | | | |
| British Gas | Non-confidential | Yes |  |
| E.ON | Non-confidential | Yes – this modification to the DCUSA would be beneficial when looked at in terms of the smart metering roll out and in principle would be helpful in helping suppliers move forwards in being able to achieve roll out figures and carry out works essential to the smart process. |  |
| Electricity North West | Non-confidential | We understand the intent of DCP 304. |  |
| Npower | Non-confidential | Yes |  |
| Northern Powergrid | Non-confidential | Yes |  |
| Scottish Power | Non-confidential | We understand what DCP 304 is trying to achieve |  |
| SP Energy | Non-confidential | Yes |  |
| SSE | Non-confidential | Yes |  |
| SSEN | Non-confidential | We fully understand the intent of DCP304. |  |
| UK Power Networks | Non-confidential | Yes- it seeks to improve the customer service where currently under DCUSA the restrictions prevent the efficient completion of work because of often historical arrangements. |  |
| Western Power | Non-confidential | Yes |  |

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| Company | Confidential/  Anonymous | 1. Are you supportive of the principles of the DCP304? If not, why not? |
| Response Summary:  Seven respondents were supportive of the principles of DCP304, with four respondents giving qualified support or remaining neutral. | | |
| British Gas | Non-confidential | Yes, we believe this will support the smart meter roll-out |
| E.ON | Non-confidential | Neutral – Whilst we can see the benefits from a B2B and Non-Supply perspective, especially in terms of the Smart rollout, there are issues around how allowing non-appointed agents to break seals and work on meters fits in with the current supplier hub principle. There does not seem to be a robust way for suppliers to manage the performance of non-appointed MOAs. There are also potential risks around non appointed MOPs making changes to advanced/HH metering which are not required. We would also welcome clarification around how this process would work for COP approved metering configurations. Furthermore, we believe clarification should also be sought in regards to any potential crossover when the SMETS 3 stage of the rollout occurs. |
| Electricity North West | Non-confidential | We are supportive of the principals of DCP 304. |
| Npower | Non-confidential | Npower are supportive of the principles of the DCP 304. |
| Northern Powergrid | Non-confidential | Yes. We support the change for the work to be carried out by metering operatives as it will play a key part in the successful operational delivery of Smart Meters and help the industry to provide a better customer experience. |
| Scottish Power | Non-confidential | We are supportive of the principles of DCP 304 in relation to SMART meter installs, however we do not believe the proposal or legal text is clear that this change would only apply to SMART installs not every other type of work. I.e. Installing an isolator the meter operator would still require WI3-OPS from the DNO. We are also nervous about opening this up for staff to start working on looped neutrals, given the experience some of these installers have and safety implications if they get this wrong. We also reference this concern to Revenue Protection work |
| SP Energy | Non-confidential | Yes |
| SSE | Non-confidential | We recognise the aims of DCP304 but we believe a fuller assessment of the consequential impacts on other market processes is necessary.  Our understanding of this proposal is that a meter operator can carry out work on a meter despite not being appointed to do so. It is therefore unclear how the registered supplier and appointed meter operator will be made aware of any changes that the non-appointed meter operator makes to the asset or its position. Furthermore, it is unclear the extent to which the ‘non-appointed meter operator’ can reposition other meters, for example, in shared meter rooms could several meters be moved minimally. DCP304 doesn’t mention whether the working group has considered the potential impacts of moving smarter meters on the consumer and registered supplier.  Where there is a shared supply it may be necessary for the non-appointed meter operator to understand whether the customer is on the priority services register and has medically dependent equipment on site, however it is unclear how this is achieved.  In the case of a revenue protection activity, we would ask whether the relevant theft working groups under DCUSA have reviewed DCP304, as the proposal doesn’t reference this one way or another.  It is also worth noting we have not yet sought a legal view on any legal implications of a meter operator working on a site where it is not contracted to do so. |
| SSEN | Non-confidential | We are supportive of this proposed change. |
| UK Power Networks | Non-confidential | Yes we are supportive of the arrangements. |
| Western Power | Non-confidential | WPD supports the principle of industry parties working together where there is shared equipment but does not support DCP 304 as it currently stands for the following reasons:  (A) “Third Party Electricity Supplier” and “Responsible Third Party Electricity Supplier” have not been defined and consequently it is unclear who WPD would be making an agreement with.  (B) Isolators form part of the Customer Installation and not part of the Company Assets nor part of the User Assets and consequently WPD believes these to be outside the scope of both DCUSA and MOCOPA.  (C) Including Isolators opens the industry to challenge from electrical contracting organisations that we are restricting, preventing, or distorting competition because we do not permit electricians to remove the cut-out fuse in order to undertake work on the customer’s installation i.e. they either have to pay for a temporary de-energisation of the customer’s installation or work live. WPD is concerned that the inclusion of isolators may lead to accusations of cronyism and the industry being forced to accept withdrawal and reinstatement of cut-out fuses by electricians.  (D) Whilst DCUSA can convey rights to Third Party Electricity Suppliers to operate and work on industry equipment it does not (and cannot) convey any rights for the Third Party Electricity Supplier to access premises for which it is not the registered supplier.  (E) This change appears to undermine the industry agreed process whereby a Supplier Party reports safety and equipment condition issues i.e. Category A, B & C issues by telephone or data flow (as appropriate) and DNOs/IDNOs resolve these issues in accordance with defined service levels. All issues identified by a Third Party Electricity Supplier appear to be reported to the DNO by telephone, which causes the following difficulties:   * Issues will be reported by a Meter Operator Agent and consequently DNO/IDNO staff would have to determine whether the issue being reported was from the “appointed” MOP or a “third party” MOP. DNOs / IDNOs would have to have two completely separate processes for MOP condition reports, one for an issue reported by the “appointed” MOP and one for an issue reported by a “third party MOP”. This will cause confusion and will not be efficient. * Resolution of the issue will be outside the scope of the Service Levels, which is not helpful to the Third Party Electricity Supplier nor the customer associated with the premises. * It is unclear whether the costs of resolving the issue can be recovered under the smart meter intervention process as the intervention work has to be within a time-limited window of a smart meter install at the premises in question. These issues will be reported whilst a supplier is carrying out work at adjacent premises.   (F) Some of the proposed legal text changes are odd to say the least because they appear to treat the Third Party Electricity Supplier as though they are the responsible electricity supplier for the premises. For example, Clauses 52B.5 & 52B.6 (Company’s Rights to De-energise) and Clause 52B.8 (Other Matters) are probably inappropriate. A similar scenario applies to Clauses 52H.5, 52H.6.  (G) Consideration should be given as to whether a section covering Third Party Electricity Supplier to Gas Supplier Relationships is required. The intent of the change proposal is to allow the Third Party Electricity Supplier to carry out minimal repositioning of electricity metering equipment. (Gas) Smart Metering Comms Hub Devices may be installed on the meter board and currently DCUSA Section 2D only permits the registered Supplier to move this equipment. |

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| Company | Confidential/  Anonymous | 1. Do you believe this change will impact any other industry codes or documents, other than MOCoPA? If so, please describe the impact and the code or document that it relates to. |
| Response Summary:  Nine respondents believed that DCP304 will either have no effect or would only affect MOCoPA, with two respondents giving additional information. | | |
| British Gas | Non-confidential | No |
| E.ON | Non-confidential | The BSC places requirements around obtaining commissioning records. How would this happen under the scenarios whereby non appointed agents are carrying out work on certain meters?  There could be a potential need for DTC changes to the MRA – for instance the D367 flow is not currently MOA to MOA transferable and could potentially need to be if Non Appointed MOAs intend to inform appointed MOAs around works carried out. |
| Electricity North West | Non-confidential | Apart from the MOCOPA® we do not believe this change will impact other industry codes or documents. |
| Npower | Non-confidential | Npower does not believe there will be any impact on other industry codes or documents, aside from MOCoPA. |
| Northern Powergrid | Non-confidential | No, we do not believe this change will impact codes other than MOCOPA. |
| Scottish Power | Non-confidential | No |
| SP Energy | Non-confidential | We are not aware of any industry codes that will be impacted other than MOCOPA |
| SSE | Non-confidential | At this stage of development we do not believe there are any impacts outside of MOCOPA. If this is not the case we would expect the code administrators to demonstrate full cross-code working to ensure all relevant parties have the ability to engage in the change process. |
| SSEN | Non-confidential | We are not aware of any industry codes that will be impacted other than MOCOPA. |
| UK Power Networks | Non-confidential | None noted. |
| Western Power | Non-confidential | Yes.  Whilst DCUSA can convey rights to Third Party Electricity Suppliers to operate and work on industry equipment it does not convey any rights to access premises. These aspects are covered by Acts of Parliament (e.g. Electricity Act, Utilities Act, Rights of Entry (Gas and Electricity Boards) Act etc) and these generally convey rights to the registered supplier only. |

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| Company | Confidential/  Anonymous | 1. Do you believe that DCP 304 has any environmental impacts? If so, please explain and quantify the impact. |
| Response Summary:  All eleven respondents believed that DCP304 will have no negative environmental impact, with three respondents believing it would have a positive impact. | | |
| British Gas | Non-confidential | No |
| E.ON | Non-confidential | No |
| Electricity North West | Non-confidential | Where the work required can be completed during one visit it will have a positive impact on the environment. |
| Npower | Non-confidential | Yes.  There could be a positive environmental impact if DCP 304 was put into place. This is because if suppliers and MOAs are able to break seals and work on metering equipment, even when they aren’t the appointed agent, when they are already on site it would reduce the amount of repeat visits to the same site. This could improve efficiency and reduce harmful impacts on the environment. |
| Northern Powergrid | Non-confidential | We are not aware of any. |
| Scottish Power | Non-confidential | No |
| SP Energy | Non-confidential | We are not aware that DCP304 has any environmental impacts. |
| SSE | Non-confidential | We do not believe there to be any environmental impacts. |
| SSEN | Non-confidential | We are not aware that DCP304 has any environmental impacts. |
| UK Power Networks | Non-confidential | The process changes will enable more first time fixes, fewer visits, less driving & fuel usage enabling more smart meter installations to take place in any given time. |
| Western Power | Non-confidential | No |

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| Company | Confidential/  Anonymous | 1. Do you believe there will be any unintended consequences of the implementation of DCP 304?. |
| Response summary:  Six respondents believed that there will be unintended consequences resulting from the implementation of DCP304. These include retrospective COMC downgrades, and a perception that the change allows non-metering operatives to carry out work on meters. Five respondents believed that there will be no unintended consequences. | | |
| British Gas | Non-confidential | No |
| E.ON | Non-confidential | As well as the issues highlighted in answers to previous questions, there is the ability for this modification to cause unintended retrospective COMC downgrades. Furthermore, if repositioning or replacement on meters occurs, there could potentially be a problem remotely contacting meters. Safeguards or clarification should be provided in order to stop this happening. |
| Electricity North West | Non-confidential | We do not believe DCP 304 will have any unintended consequences. |
| Npower | Non-confidential | No |
| Northern Powergrid | Non-confidential | Yes. There could be a perception that this change allows for the work to be carried out by non-metering operatives of meter operator parties e.g. a party fitting solar panels. This change is specifically for metering operatives to carry out the metering related work specified and for the reasons stated. |
| Scottish Power | Non-confidential | Yes, that the proposed changes are misinterpreted and not used only for SMART installs |
| SP Energy | Non-confidential | We are not aware of any unintended consequences associated with the implementation of DCP304 |
| SSE | Non-confidential | We believe further consideration needs to be given to the potential interruption of the supply for customers on a shared supply, especially those in vulnerable situations. |
| SSEN | Non-confidential | We are not aware of any unintended consequences associated with the implementation of DCP304. |
| UK Power Networks | Non-confidential | No – however, the CP may enable smart meter suppliers to work closer together which should improve customer service. |
| Western Power | Non-confidential | Yes.  (A) Including isolators opens the industry to challenge from electrical contracting organisations that we are restricting, preventing, or distorting competition because we do not permit electricians to remove the cut-out fuse in order to undertake work on the customer’s installation i.e. they either have to pay for a temporary de-energisation of the customer’s installation or work live. WPD is concerned that the inclusion of isolators may lead to accusations of cronyism and the industry being forced to accept withdrawal and reinstatement of cut-out fuses by electricians.  (B) Whilst DCUSA can convey rights to Third Party Electricity Suppliers to operate and work on industry equipment it does not convey any rights to access premises.  (C) This change appears to undermine the industry agreed process whereby a Supplier Party reports safety and equipment condition issues (i.e. Category A, B & C issues) by telephone or data flow (as appropriate) and DNOs/IDNOs resolve these issues in accordance with defined service levels. All issues identified by a Third Party Electricity Supplier appear to be reported to the DNO by telephone and are not subject to any service levels.  (D) Consideration should be given as to whether a section covering Third Party Electricity Supplier to Gas Supplier Relationships is required. The intent of the change proposal is to allow the Third Party Electricity Supplier to carry out minimal repositioning of electricity metering equipment. (Gas) Smart Metering Comms Hub Devices may be installed on the meter board and currently DCUSA Section 2D only permits the registered Supplier to move this equipment. |

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| Company | Confidential/  Anonymous | 1. Are there any alternative solutions or matters that should be considered? If yes, please describe these. |
| Response summary:  Six respondents stated that there are no alternative solutions or matters that should be considered, with five respondents giving alternative solutions or matters to be considered. | | |
| British Gas | Non-confidential | No |
| E.ON | Non-confidential | No |
| Electricity North West | Non-confidential | As the Meter Operator Agent is appointed by a Supplier the introduction of the new Section 2E would add unnecessary complexity to the solution, in essence we are replicating the legal text used for the MOCOPA® change, so as an alternative we should amend Clause 27 under Section 2A as follows: |
| Npower | Non-confidential | Yes.  For clarity, we would like to understand how the appointed supplier would be notified should the MOA make a change to the energisation status of the meter at the site where they are not the appointed MOA. This work would only be done under a fault condition and would not be done intentionally. The legal text covers the actions the third party MOA must follow to notify the Distributor of a fault, but this does not flow through to informing the appointed supplier. |
| Northern Powergrid | Non-confidential | No, we have no alternative solutions to consider |
| Scottish Power | Non-confidential | No |
| SP Energy | Non-confidential | We are not aware of any alternative solutions. |
| SSE | Non-confidential | We believe that the existing solution would require further development before we would advise that an alternative solution was necessary. |
| SSEN | Non-confidential | We are not aware of any alternative solutions.  We are aware that some Suppliers already follow this approach when they encounter the situations detailed in the change report. This change proposes a pragmatic approach to providing appropriate governance whilst enabling suppliers and their agents to install meters when they encounter a “shared fuse” situation. |
| UK Power Networks | Non-confidential | No |
| Western Power | Non-confidential | Yes.  Evaluate whether it is possible for the Third Party Electricity Supplier to determine the MPAN for the premises in question (e.g. from MPAS / ECOES). This would then enable them to report safety and equipment condition issues in accordance with the industry agreed Cat A, B & C process. It is recognised that there may be data protection issues which will preclude such an approach. |

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| Company | Confidential/  Anonymous | 1. Do you foresee any system changes being required to implement DCP 304? |
| Response summary:  Eight respondents stated that no system changes would be required to implement DCP304, with three respondents giving information for consideration. | | |
| British Gas | Non-confidential | No |
| E.ON | Non-confidential | Small system changes could be required if it is found that changes to the DTC are required to facilitate the intention of this modification. |
| Electricity North West | Non-confidential | We do not envisage any system changes as a consequence of DCP 304. |
| Npower | Non-confidential | No |
| Northern Powergrid | Non-confidential | Not from a Distribution Business perspective. No comment on Meter Operator or Supplier systems |
| Scottish Power | Non-confidential | No |
| SP Energy | Non-confidential | We are not aware of any system changes that will be required to implement this change. |
| SSE | Non-confidential | At this stage there appears to be potentially significant impacts to the way we manage metering appointments. If our metering business carried out work on a site that they are not appointed to, then we would assume some mechanism would need to be developed to notify this information to the appointed meter operator and/or register supplier. There also needs to be a fuller assessment of other market processes that may need to change. |
| SSEN | Non-confidential | We are not aware of any system changes that will be required to implement this change. |
| UK Power Networks | Non-confidential | No |
| Western Power | Non-confidential | Yes.  DNOs/IDNOs may need to make some system changes in order to capture and process pertinent information associated with an issue reported by a “third party” MOP/Supplier. |

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| Company | Confidential/  Anonymous | 1. The proposed implementation date is the first standard release following Authority consent (which is anticipated to be June 2018), do you agree with this? If not, why not? |
| Response summary:  Ten respondents agreed with the proposed implementation, with one respondent stating that the date does not at present appear feasible. | | |
| British Gas | Non-confidential | Yes |
| E.ON | Non-confidential | Yes, the stipulated timescales seem adequate. |
| Electricity North West | Non-confidential | This does seem a reasonable time frame for the implementation of DCP 304. |
| Npower | Non-confidential | Yes |
| Northern Powergrid | Non-confidential | Yes |
| Scottish Power | Non-confidential | If the proposal is accepted, then we are happy with the implementation date of June 2018 |
| SP Energy | Non-confidential | We agree with the proposed implementation date for this change. |
| SSE | Non-confidential | At this stage, given the level of unknowns June 2018 does not appear feasible. |
| SSEN | Non-confidential | We agree with the proposed implementation date for this change. |
| UK Power Networks | Non-confidential | Yes |
| Western Power | Non-confidential | Yes |

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| Company | Confidential/  Anonymous | 1. Do you agree that DCP 304 better facilitates the DCUSA Objectives? If not, why not? |
| Response summary:  Ten respondents agreed that DCP 304 better facilitates the DCUSA objectives, with one respondent stating that a fuller assessment needed to be carried out before a judgement could be given. | | |
| British Gas | Non-confidential | Yes |
| E.ON | Non-confidential | Yes |
| Electricity North West | Non-confidential | DCP 304 will enhance an existing process by making it more efficient and negating the need for additional visits which ultimately has a positive impact and will better facilitate DCUSA General Objective 4 ‘The promotion of efficiency in the implementation and administration of the DCUSA.’ |
| Npower | Non-confidential | Yes |
| Northern Powergrid | Non-confidential | Yes |
| Scottish Power | Non-confidential | We agree with that DCP 304 better facilitates the DCUSA objectives however the wording of the proposal and legal text is not clear and before implementation would require a review |
| SP Energy | Non-confidential | We agree that DCP304 better facilitates the DCUSA objectives. |
| SSE | Non-confidential | The extent to which DCUSA Objectives are better facilitated will be clearer once a fuller assessment has been carried out on any consequential impacts of DCP304 on other market processes. |
| SSEN | Non-confidential | We agree that DCP304 better facilitates the DCUSA objectives, including General Objective 1 in our view. |
| UK Power Networks | Non-confidential | Yes, it will speed up the smart meter roll-out by improving the efficiency of installations. |
| Western Power | Non-confidential | Yes |

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| Company | Confidential/  Anonymous | 1. Do you have any comments on the legal drafting? |
| Response summary:  Seven respondents gave comments on the legal drafting, with four giving no comment. | | |
| British Gas | Non-confidential | The legal drafting requires legal review |
| E.ON | Non-confidential | No |
| Electricity North West | Non-confidential | The legal text contained within Section 2E and Section 2F does not exactly match the legal text for MOCOPA® CP0090M. We should use the same text:  SCOPE OF SECTION 2E / 2F  “...DNO/IDNO Party shall allow a Third Party Electricity Supplier Party to.../...Supplier Party shall allow a Third Party Electricity Supplier Party to...break the seals on and work upon metering equipment and distribution business equipment, if:  (a) at the relevant Metering Point, they are the appointed Meter Operator Agent and are instructed by the electricity Supplier appointed to the relevant Metering Point; or,  (b) for whole current metering only, at the relevant Metering Point, they are not the appointed Meter Operator Agent, but they are required to carry out the following work at the Metering Point (excluding replacing meters):  i. minimal reposition of third party meter in communal meter position, to accommodate space for appointed smart meter installation;  ii. work on looped neutral(s) on metering equipment;  iii. work on a shared supply;  iv. investigation/remedial revenue protection work; and  i.v. installation of an isolator; |
| Npower | Non-confidential | No |
| Northern Powergrid | Non-confidential | Yes. The wording of the scope of section 2E doesn’t quite flow. Suggestion below.  This Section 2E and the Schedules referred to in it set out the terms and conditions pursuant to which a DNO/IDNO Party shall allow a Third Party Electricity Supplier Party to carry out the following:  • Carry out Minimal reposition of Electricity Supplier’s 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.  This text is repeated in a number of places within the proposed legal drafting. |
| Scottish Power | Non-confidential | Yes, we are concerned that the categories are individually bulleted in the legal text. Initially it should be clear that the above changes are only when installing SMART meters and nothing outwith. |
| SP Energy | Non-confidential | We have no comments regarding the legal drafting. |
| SSE | Non-confidential | We will fully review the legal drafting once the solutions of this modification have been fully considered. |
| SSEN | Non-confidential | We have no comments regarding the legal drafting. |
| UK Power Networks | Non-confidential | Yes.  It would be preferable to narrowly define who the third party supplier is or how he is responsible e.g. at the time of the works the third party supplier supplies a customer via the assets at the Exit Point or a customer whose supply is directly impacted by the works being carried out (e.g. in the case of moving someone else’s meter). |
| Western Power | Non-confidential | Definition of “Third Party Electricity Supplier” has not been included.  Definition of “Responsible Third Party Electricity Supplier” has not been included.  Some of the proposed legal text changes are odd to say the least because they appear to treat the Third Party Electricity Supplier as though they are the responsible electricity supplier for the premises. For example, Clauses 52B.5 & 52B.6 (Company’s Rights to De-energise) and Clause 52B.8 (Other Matters) are probably inappropriate. A similar scenario applies to Clauses 52H.5, 52H.6.  Consideration should be given as to whether a section covering Third Party Electricity Supplier to Gas Supplier Relationships is required. The intent of the change proposal is to allow the Third Party Electricity Supplier to carry out minimal repositioning of electricity metering equipment. (Gas) Smart Metering Comms Hub Devices may be installed on the meter board and currently DCUSA Section 2D only permits the registered Supplier to move this equipment. |

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| Company | Confidential/  Anonymous | 1. Do you have any further comments? |
| Response summary:  Nine respondents declined to give any further comments, with two respondents giving comments for consideration. | | |
| British Gas | Non-confidential | No |
| E.ON | Non-confidential | No |
| Electricity North West | Non-confidential | No further comments to add |
| Npower | Non-confidential | No |
| Northern Powergrid | Non-confidential | No further comments |
| Scottish Power | Non-confidential | No |
| SP Energy | Non-confidential | As a DNO we have little comment to make subject to the provision that all staff who undertake the activity are suitably authorised, trained and competent to do so. |
| SSE | Non-confidential | No |
| SSEN | Non-confidential | We have no further comments |
| UK Power Networks | Non-confidential | Thought should be given on how Suppliers will notify one another when such work has been undertaken.  Further thought should be given to the recording of situations such as a DNO being called to intervene by Supplier A on metering equipment that belongs to Supplier B. |
| Western Power | Non-confidential | No |