

**DCP 253 – DNO Audit Proposal Request For Information – Collated Responses**

Company	Confidential / Anonymous	1. Do you understand DCUSA Change Proposal (DCP) 253?	Working Group Comments
<p>Response Summary:</p> <p>All ten respondents understand DCP 253 and its intent.</p>			
Flow Energy	Non-Confidential	Yes.	Noted
British Gas	Non-Confidential	<p>We understand and support the principles introduced by DCP 253. However as a result of DCP 253 we are become increasingly concerned at the poor workmanship of DNO operatives when working on Suppliers metering equipment. Examples of where we encountered issues include:</p> <ul style="list-style-type: none"> <li>• Cross polarity left at incoming supply after cut-out change</li> <li>• Exposed terminals</li> <li>• Loose terminals</li> <li>• Equipment sealed with side cutters or equivalent</li> <li>• Cable ID (L&amp;N) markings removed and not replaced on meter tails</li> <li>• Meter raised so when refitted not secured on top hanging screw</li> </ul>	Noted

NPOWER	Non-Confidential	Yes.	Noted
WPD	Non-Confidential	Yes. When DNOs undertake their legitimate work on the distribution network there is sometimes a higher than normal risk of disturbing the Supplier's metering equipment, and consequently DNOs must consider what preventative or reactive measures are necessary to reduce this risk. Prior to DCP 253 DNOs had no legal right to access or work on the Supplier's metering equipment in order to carry out these preventative or reactive measures.	Noted
E.ON	Non-Confidential	Yes.	Noted
Northern Powergrid	Non-Confidential	Yes.	Noted
SSE Supply	Non-Confidential	Yes.	Noted
Southern Electric Power Distribution	Non-Confidential	Yes.	Noted
Electricity North West	Non-Confidential	We understand the intent of DCP 253.	Noted
ESP Utilities	Non-Confidential	Yes, ESPUG supports the intent of DCP253.	Noted

Company	Confidential/ Anonymous	2. Do you accept DCP 253 permits DNOS to alter the connections to the metering?	Working Group Comments
<p>Response Summary:</p> <p>Eight respondents accepted that DCP 253 permits DNOs to alter the connections to the metering, with two respondents providing comments for further consideration.</p>			
Flow Energy	Non-Confidential	Yes.	Noted
British Gas	Non-Confidential	We accept that under DCP 253 DNOs are permitted to work on metering equipment.	Noted
NPOWER	Non-Confidential	Yes.	Noted
WPD	Non-Confidential	"Alter" and "metering" are slightly ambiguous terms. DCP 253 permits DNOs to access the terminals of whole current meters, to tighten those terminals, and if necessary remake the connections to those terminals.	Noted
E.ON	Non-Confidential	Yes.	Noted
Northern Powergrid	Non-Confidential	Yes – it allows DNOs to carry out limited scope work on the metering equipment	Noted
SSE Supply	Non-Confidential	Yes.	Noted

Southern Electric Power Distribution	Non-Confidential	Yes.	Noted
Electricity North West	Non-Confidential	We supported DCP 253 as it consented to a DNO/IDNO adjusting the terminals of the meter (and, where appropriate, re-making the connections to them to remedy any disturbance of the connections that may have occurred unintentionally) and temporarily removing the meter and then (as soon as reasonably practicable thereafter) re-installing the meter as close as reasonably practicable to its original position.	Noted
ESP Utilities	Non-Confidential	<p>DCP253 specifically permits DNOs to access and tighten connections to the metering system following its works (prior to re-energisation).</p> <p>“Where the Company replaces or maintains or operates Connection Equipment.....the User permits the Company to access the terminals of the whole current Metering System <b>to tighten those terminals and if necessary remake the connections</b> to those terminals so <b>as to remedy possible disturbance of the connections</b> to the whole current Metering System <b>that may have arisen as a consequence of the Company’s actions</b>”.</p> <p>We believe provisions for tightening connections at the cut-outs should be considered prior to creating and implementing new audit requirements for DCP253. Please see comments in Q10 for further information.</p>	Noted

Company	Confidential/ Anonymous	3. Do you accept that the requirements of MOCOPA® should apply equally to DNOs/iDNOs as to MOPs, as far as metering work under DCP 253 is concerned?	Working Group Comments
<p>Response Summary:</p> <p>Seven respondents accepted that the requirements of MOCOPA® should apply equally to DNOs/iDNOs as to MOPs, as far as metering work under DCP 253 is concerned, with three respondents providing comments for consideration.</p>			
Flow Energy	Non-Confidential	Yes.	Noted
British Gas	Non-Confidential	<p>No we do not believe it should apply equally but we do believe there are some MOCOPA requirements that should apply to DNO's through DCUSA.</p> <p>The MOCOPA currently states in clause 18:</p> <p>"18. AREA IN WHICH THE AGREEMENT IS APPLICABLE This Agreement shall be applicable and enforceable in respect of meter operation and associated activities performed by each MOCOPA® Operator when operating upon or on equipment connected to the Distribution System of a party to this Agreement in the capacity of Distribution Business from time to time."</p> <p>We would therefore question whether the obligations contained within MOCOPA do actually apply to Distribution Businesses and how enforceable any of the MOCOPA requirements are on Distribution Businesses. In which case extending any audit requirements onto Distribution Businesses may be unenforceable.</p> <p>We would suggest that a better solution would be to introduce new obligations into the DCUSA to ensure Distribution Business operatives wishing to work on</p>	<p>The Group noted this response and suggested that MOCOPA could be updated to ensure that it is enforceable for DNOs as it is a multi-party agreement between DNOs and MOPs. The Group noted that DCUSA does not contain an audit process, which provides the evidence that metering work is being undertaken appropriately.</p>

		metering equipment are appropriately trained, qualified, use good industry practice and use seals that provide the appropriate audit trail following work on metering equipment.	
NPOWER	Non-Confidential	Yes.	Noted
WPD	Non-Confidential	The requirements of MOCOPA do apply to DNOs, for example, security sealing of equipment, control of sealing pliers, identification marking of conductors etc.	Noted
E.ON	Non-Confidential	Yes.	Noted
Northern Powergrid	Non-Confidential	Yes. Compliance to MOCOPA should apply equally to all parties. However, as MOCOPA is an agreement between distributors and meter operators, and as metering equipment is the responsibility of the supplier (who is not a MOCOPA party) then we consider it appropriate for this request for information, with regard to a DCUSA change, to be via the DCUSA interventions working group.	Noted
SSE Supply	Non-Confidential	Yes.	Noted
Southern Electric Power Distribution	Non-Confidential	In the context of this RFI we do not act as a Meter Operator.  The instances where a DNO may need to remove meter seals were clearly defined by the DCP253 Working Group. We confirm that we will only remove a meter terminal cover where there is an absolute need to do so, i.e. in accordance with the document titled 'DNO Access to Meter Terminals' attached to our response and embedded	The Group noted this response and suggested that metering work other than the removal of a meter terminal cover may be undertaken. When metering work is undertaken, it was agreed that MOCOPA should be adhered to and that the DNO HQ audit should be expanded to cover such circumstances.

		<p>below:</p>  <p><b>Attachment 5 - ENA Reasons for DNOs to</b></p> <p>Given that the instances where we will remove meter seals and access the meter terminals are identified and limited, we do not agree that the full scope of Meter Operator auditing as defined in MOCOPA is appropriate for this work when undertaken by us.</p> <p>We do however accept that it would be appropriate to be subject to some degree of HQ type audit, which could be undertaken as a MOCOPA obligation. We would expect any audits to be undertaken as part of the existing MOCOPA DNO audit regime and the focus to be on the management of policies and procedures.</p>	
Electricity North West	Non-Confidential	It would seem appropriate for a consistent approach to be in place.	Noted
ESP Utilities	Non-Confidential	ESPUG agrees that the requirements should be applied equally in respect to metering work under DCP 253 where there is any safety risk.	Noted

Company	Confidential/ Anonymous	4. Do you accept that DNO/IDNO compliance to MOCOPA® should be checked in some way?	Working Group Comments
<p>Response Summary:</p> <p>Eight respondents accepted that DNO/IDNO compliance to MOCOPA® should be checked in some way, with one respondent providing comments for consideration and one respondent disagreeing.</p>			
Flow Energy	Non-Confidential	Yes.	Noted
British Gas	Non-Confidential	No	Noted
NPOWER	Non-Confidential	Yes.	Noted
WPD	Non-Confidential	<p>DNOs are already subject to an annual HQ audit to check compliance with MOCOPA.</p> <p>The audit check includes, amongst other things, (i) confirmation of sealing practices, (ii) confirmation of controls on sealing pliers, and (iii) confirmation of identification marking practices, etc.</p> <p>If you meant to ask whether the DNO/IDNO should be subject to site audits, then the answer is “No”, for the following reasons:</p> <ul style="list-style-type: none"> <li>• The MOCOPA agreement allows Meter Operators to break the seals on, operate and work on DNO equipment for the purpose of controlling safety at the point of work, without requiring the attendance of the DNO.</li> <li>• DNOs consent to this on the basis that the Meter Operator has safe systems of work and utilises</li> </ul>	<p>The Group noted this response and highlighted that the quality of work and security of supply are mentioned within the MOCOPA. If a MOP does not seal correctly, this will be recorded as a non-conformance.</p>

		<p>safe working practices, and that this is independently verified by periodic HQ and Site Audits (i.e. verified by the Registration Authority).</p> <ul style="list-style-type: none"> <li>The purpose of the site audits are to check that electrical safety is being adequately managed. They are not about checking the quality of work.</li> </ul> <p><i>[In WPD's opinion, the current audit regime unnecessarily extends beyond the safety remit to include an element of quality checking. Work quality is a matter between the Supplier and their Agent, not between the DNO and the Agent]</i></p> <ul style="list-style-type: none"> <li>Site auditing of DNO/IDNO would essentially be a check on the quality of work.</li> </ul>	
E.ON	Non-Confidential	Yes.	Noted
Northern Powergrid	Non-Confidential	Yes. DNOs have a responsibility to adhere to MOCOPA so should be checked for compliance in some way.	Noted
SSE Supply	Non-Confidential	Yes.	Noted
Southern Electric Power Distribution	Non-Confidential	Some degree of compliance check is reasonable but this should be limited to the scope identified in our response to question 3.	Noted
Electricity North West	Non-Confidential	It would be useful to recognise in the MOCOPA® that DNOs/IDNOs are able to undertake such metering work.	Noted

ESP Utilities	Non-Confidential	Yes.	Noted
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<b>Company</b>	<b>Confidential/ Anonymous</b>	<b>5. (Assuming the answer to 4 is "Yes") Do you accept that it would difficult to organise work in progress audits?</b>	<b>Working Group Comments</b>
Response Summary:			
Nine respondents accepted that it would difficult to organise work in progress audits, with one respondent disagreeing and providing their supporting rationale for consideration.			
Flow Energy	Non-Confidential	Yes. As the DNO may not know the full nature of the job in advance, organising a work in progress audit on the day would remove efficiencies gained by allowing the DNO to work on the metering equipment.	Noted
British Gas	Non-Confidential	Yes	Noted
NPOWER	Non-Confidential	We accept it would be difficult given the nature of DNO work but not that it would be impossible. The only way to ensure full compliance is to inspect works carried out either retrospectively or in progress.	Noted
WPD	Non-Confidential	The answer to 4 is "No" in respect of site audits.  WPD agrees that it would be very difficult to organise site audits because the work it carries out on whole current metering is done very infrequently and is trivial in nature	Noted
E.ON	Non-Confidential	Yes.	Noted

Northern Powergrid	Non-Confidential	A work-in-progress audit may not be difficult to organise in terms of identifying an address of where a cut-out change will take place but it is very difficult to predict a time a MOCOPA auditor would need to be on site in order to witness the MOCOPA auditable aspect of work. It is highly likely to result in a considerable amount of wasted MOCOPA auditor time as the only aspect of a cut-out change that would be auditable under the DCP 253 change is the meter terminal connection check which is only an extremely small percentage of the time taken to complete the overall job – particularly where a dig and joint is required. This would not be a cost effective use of limited MOCOPA auditor time especially when considering the increase in demand on the auditor time due to the inevitable huge increase in meter operatives into the industry in the very near future.	The Group noted this and considered post installation audits, which would check that the seals had been correctly actioned and marked with waste products being removed.  It was suggested that this could be considered by the MOCOPA Working Group.
SSE Supply	Non-Confidential	Yes.	Noted
Southern Electric Power Distribution	Non-Confidential	Given the unplanned nature of this work, the auditing of work in progress would be extremely difficult to organise and indeed it would not cover a significant volume, as this activity is associated with the resolution of emergency situations.	Noted
Electricity North West	Non-Confidential	We agree this would be difficult to organise as there isn't the luxury of having advanced notice of when this work would be required.	Noted
ESP Utilities	Non-	Yes. This work will predominantly be unplanned and	Noted

	Confidential	carried out in response to emergency situations. Third party audits would be difficult to arrange.	
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Company	Confidential/ Anonymous	6. (Assuming the answer to 4 is "Yes") Do you accept that DNOs/IDNOs should be obliged to keep a record of work affecting the metering (for subsequent auditing)?	Working Group Comments
Response Summary:			
Six respondents accepted that DNOs/IDNOs should be obliged to keep a record of work affecting the metering (for subsequent auditing), with the remaining four respondents disagreeing and providing comments for consideration.			
Flow Energy	Non-Confidential	Yes	Noted
British Gas	Non-Confidential	Holding a record of work done on metering equipment would seem sensible	Noted
NPOWER	Non-Confidential	Yes – this is vital	Noted
WPD	Non-Confidential	The answer to 4 is "No" in respect of site audits.  WPD does not accept that DNOs/IDNOs should be obliged to keep a record of work affecting the metering because the work is carried out infrequently and is trivial in nature.	Noted
E.ON	Non-Confidential	Yes – the results should be accessible to the current MOA and Supplier.	Noted

Northern Powergrid	Non-Confidential	No. As part of normal operating procedures we accept the DNO should keep a record of where a site visit is made. However, as an audit on the requirements contained within DCP253 can only be effectively carried out through a work-in-progress audit, keeping a record for 'subsequent auditing' would serve no purpose and so is not required. Therefore, a DNO should not be obliged to keep a record for auditing purposes.	<p>This response was considered and the previous response to Question 5 was noted in terms of post complete audits. It was further noted that cut-out changes are undertaken on an infrequent basis, which may not be recorded likewise the meter terminals work may not be recorded. Where checks for tightness are undertaken it was noted that DNOs may not mark the seals as live and neutral if they are not already marked. It was suggested that as DNOs are not MOCOPA Operators they do not have to comply with MOCOPA. It was agreed that where meter tails are disturbed they should be marked. It was suggested that this should be clarified within MOCOPA the instances in which a DNO should mark the meter tails.</p> <p>It was further suggested that DNOs internal audit procedures should be made available for the MOCOPA HQ Audit purposes.</p>
SSE Supply	Non-Confidential	Yes.	Noted
Southern Electric Power Distribution	Non-Confidential	<p>At this time we do not agree that keeping a record of locations where this work is undertaken (for subsequent auditing) is reasonable.</p> <p>The issue of identifying locations where a DNO operative was the last person to access the meter terminals was discussed at length by the Working Group during the</p>	Noted

		<p>development of DCP 253. It was agreed at that time that the meter seal was the most appropriate means by which identification would take place.</p> <p>If there is need to keep a record of all instances where we remove meter terminal covers then it is likely that we would choose not to remove the covers and seek assistance from the Supplier/ MOp, i.e. revert to the position prior to the implementation of DCP 253. This will have an obvious impact upon customer service and MOp resources.</p>	
Electricity North West	Non-Confidential	This doesn't seem appropriate for the metering work involved, it would seem more appropriate to ask for confirmation that procedures document that where required the DNO/IDNO carries out the necessary metering work in line with DCP 253.	Noted
ESP Utilities	Non-Confidential	Yes	Noted

Company	Confidential/ Anonymous	7. (Assuming the answer to 4 is "Yes") Do you accept that an audit of the DNOs/IDNOs relevant procedures and training records would give a level of compliance checking (e.g. if added to the existing "HQ desktop" audit)?	Working Group Comments
<p>Response Summary:</p> <p>Eight respondents accepted that an audit of the DNOs/IDNOs relevant procedures and training records would give a level of compliance checking, with the remaining two respondents disagreeing and providing their rationale for consideration.</p>			
Flow Energy	Non-	Yes	Noted

	Confidential		
British Gas	Non-Confidential	No – see response to question 3	Noted
NPOWER	Non-Confidential	As per the response to '5' this would give a level of compliance checking but there would be a preference for some site/work checks in addition.	Noted
WPD	Non-Confidential	The answer to 4 is "No" in respect of site audits.  DNOs/IDNOs are already subject to an annual HQ audit by the Registration Authority to check compliance with MOCOPA, and in WPD's opinion the existing arrangement is suitable and sufficient.	Noted
E.ON	Non-Confidential	Yes	Noted
Northern Powergrid	Non-Confidential	Yes – we believe this would provide an adequate level of MOCOPA compliance check.	Noted
SSE Supply	Non-Confidential	Yes.	Noted
Southern Electric Power Distribution	Non-Confidential	We agree that auditing of relevant procedures would be appropriate. Further consideration would need to be given to providing training records as this is a new requirement for DNOs.	Noted
Electricity North West	Non-Confidential	As stated in Q6 above this seems the most appropriate solution.	Noted
ESP Utilities	Non-Confidential	Yes. Adding this check to the existing HQ desktop audit would be efficient and support the embedding of relevant	Noted

		procedures into wider business processes.	
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<b>Company</b>	<b>Confidential/ Anonymous</b>	<b>8. (Assuming the answer to 4 is "Yes") Do you accept that the MOCOPA® Registration Authority should be asked to undertake this work?</b>	<b>Working Group Comments</b>
Response Summary:			
Eight respondents accepted that the MOCOPA® Registration Authority should be asked to undertake this work, with the remaining two respondents disagreeing and providing comments for consideration.			
Flow Energy	Non-Confidential	Yes	Noted
British Gas	Non-Confidential	No	Noted
NPOWER	Non-Confidential	Yes	Noted
WPD	Non-Confidential	The answer to 4 is "No" in respect of site audits.  DNOs/IDNOs are already subject to an annual HQ audit by the Registration Authority to check compliance with MOCOPA, and in WPD's opinion the existing arrangement is suitable and sufficient.	Noted
E.ON	Non-Confidential	Yes	Noted
Northern Powergrid	Non-Confidential	Yes. We accept that this element should be included in the MOCOPA audit as we understand the requirement to	Noted

		comply with MOCOPA. However, as referred to in question 5, we consider that an external site audit is not the best use of auditor time. With a section for compliance with DCP253 elements added to our annual MOCOPA HQ audit, we consider this is sufficient. However, should MOCOPA parties decide an external audit is required we would facilitate it.	
SSE Supply	Non-Confidential	Yes.	Noted
Southern Electric Power Distribution	Non-Confidential	Yes, providing any additional cost is reasonable and socialised equally across all party groups (i.e. MOps and DNOs).	Noted
Electricity North West	Non-Confidential	It would seem reasonable that the MOCOPA® Registration Authority, as part of the HQ desktop audit, carries out this work.	Noted
ESP Utilities	Non-Confidential	Yes.	Noted

<b>Company</b>	<b>Confidential/Anonymous</b>	<b>9. (Assuming the answer to 4 is "Yes") Do you have an alternative suggestion for checking the DNOs/IDNOs compliance to the MOCOPA® requirements?</b>	<b>Working Group Comments</b>
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Response Summary:			
Three respondent had an alternative suggestion for checking the DNOs/IDNOs compliance to the MOCOPA® requirements.			
Flow Energy	Non-Confidential	No	Noted
British Gas	Non-Confidential	See response to question 3 (No we do not believe it should apply equally but we do believe there are some MOCOPA requirements that should apply to DNO's through DCUSA.....)	Noted
NPOWER	Non-Confidential	Per the response to '5' the preference would be for site work to be inspected/audited as well as internal 'back-office' or training audits.	Noted
WPD	Non-Confidential	The answer to 4 is "No" in respect of site audits.  DNOs/IDNOs are already subject to an annual HQ audit to check compliance with MOCOPA, and in WPD's opinion the existing arrangement is suitable and sufficient.	Noted
E.ON	Non-Confidential	No	Noted
Northern Powergrid	Non-Confidential	Yes. As described in the previous questions, we think a combination of DNO internal procedures, training and audit together with an inclusion in the external (Registration Authority) HQ audit will suffice and be a better, cost-effective option for all MOCOPA parties.	
SSE Supply	Non-Confidential	No	Noted
Southern	Non-	No	Noted

Electric Power Distribution	Confidential		
Electricity North West	Non-Confidential	We do not have an alternative suggestion.	Noted
ESP Utilities	Non-Confidential	As third party work in progress audits may be impractical, a solution may be to require the company undertaking the work to have an agreed internal audit process in place for this work, and that this process be checked and approved as part of the HQ desktop audit.	Noted

<b>Company</b>	<b>Confidential/Anonymous</b>	<b>10. Do you have any other comments?</b>	<b>Working Group Comments</b>
Response Summary: Two respondent provided additional comments for consideration.			
Flow Energy	Non-Confidential	No	Noted
British Gas	Non-Confidential	No	Noted
NPOWER	Non-Confidential	N/A	Noted

WPD	Non-Confidential	No	Noted
E.ON	Non-Confidential	A possible addition could be to allow the DNO to use the D2 to report the fault resolution back to Supplier/MO to confirm their actions, and then use that data as the driver for Audit purposes.	The Group noted that the D0002 is a fault investigate response flow, which DNOs may not have the resource to undertake. It was noted that D0002 do not always identify faults as they can be a result of precautionary measures.
Northern Powergrid	Non-Confidential	No	Noted
SSE Supply	Non-Confidential	No	Noted
Southern Electric Power Distribution	Non-Confidential	No	Noted
Electricity North West	Non-Confidential	No further comments to add.	Noted
ESP Utilities	Non-Confidential	<p>We believe it would be prudent to introduce a requirement for Meter Operators to check and tighten meter tails into the cut-out, if any work undertaken by the Meter Operator could cause a disturbance. This would reduce risk to customer safety, and also reduce the likelihood of future callouts (ie, number of category A/B interventions) which in turn would reduce customer inconvenience.</p> <p>Although we understand that this RFI is simply seeking views on the auditing of work allowed under DP253, it would be short-sighted not to capture and manage all</p>	The Group noted this and agreed that MOps already undertake this work and are obliged to do so under MOCOPA.

		<p>risks to customer safety under any new audit arrangements.</p> <p>Provisions for the Meter Operator to check and remedy any disturbance into the cut-out will be particularly important as the roll-out of smart meters increases over the next 12 months.</p>	
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