

Part A: Generic

| DCUSA Change Proposal (DCP) | | At what stage is this document in the process? |
|--|---|---|
| <p>DCP xxx: <i>(Code Administrator to issue reference)</i></p> <p><i>Insert date raised 22nd May 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>To widen the scope of DCUSA to allow meter operators to break seals and work on metering equipment at metering points at which they are not appointed meter operator.</p> | | |
|  | <p>Governance:</p> <p>The Proposer recommends that this Change Proposal should be:</p> <ul style="list-style-type: none"> • Part 1 matter • Treated as a Standard Change • Proceed to Working Group <p>The Panel will consider the proposer's recommendation and determine the appropriate route.</p> | |
|  | <p>Impacted Parties: Suppliers and DNOs</p> | |
|  | <p>Impacted Clauses:</p> | |

Guidance on the Use Of This Template:

The Guidance Notes for completing this form are provided in Part C of this template.

Please complete all sections unless specifically marked for the Code Administrator.

Green italic text is provided as guidance and should be removed by the proposer before submission.

The Code Administrator is available to help and support the drafting of any Change Proposals, including guidance on completion of this template and the wider change proposal process. Contact: DCUSA@electralink.co.uk or 0207 432 3011.

| Contents | | ? | Any questions? |
|---|--------------------------------|---|---------------------------------------|
| 1 | Summary | 2 | Contact: Code Administrator |
| 2 | Governance | | email address |
| 3 | Why Change? | 3 | telephone |
| 4 | Solution and Legal Text | 4 | Proposer: British Gas |
| 5 | Code Specific Matters | 4 | Kevin.woollard@britishgas.co.uk |
| 6 | Relevant Objectives | 4 | 07979 563580 |
| 7 | Impacts & Other Considerations | 6 | Other: Insert name |
| 8 | Implementation | 7 | email address. |
| 9 | Recommendations | 7 | telephone |
| Indicative Timeline | | | Other: Insert name |
| <i>Please provide the proposers contacts (to the right). The indicative timeline will be updated by the Code Administrator.</i> | | | email address. |
| The Secretariat recommends the following timetable: | | | telephone |
| Initial Assessment Report | dd month year | | Other: Insert name |
| Consultation Issued to Industry Participants | dd month year | | email address. |
| Change Report Approved by Panel | dd month year | | telephone |
| Change Report issued for Voting | dd month year | | Other: Insert name |
| Party Voting Closes | dd month year | | email address. |
| Change Declaration Issued to Parties | dd month year | | telephone |
| [Change Declaration Issued to Authority] | dd month year | | Other: Insert name |
| [Authority Decision] | dd month year | | email address. |
| | | | telephone |

1 Summary

What

To widen the scope of DCUSA to allow meter operators to break seals and work on metering equipment at metering points at which they are not 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 to 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
- Be treated as a Standard
- Proceed to 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

It is intended to amend the DCUSA to add new sections to Section 2 to put in place

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

Provide any reference documents that need to be considered i.e. as part of development of the Change Proposal.

MOCOPA Change Proposal CP0090M

5 Relevant Objectives

Please Note: *Charging Methodology Change Proposals should only be assessed against the DCUSA Charging Methodology Objectives and the General Change Proposals should be assessed on DCUSA General Objectives.*

Only Change Proposals impacted by both Charging and General objectives are to be assessed on both General and Charging Objectives.

| DCUSA Charging Objectives | Identified impact |
|--|-------------------|
| Please tick the relevant boxes. [See Guidance Note 10] | |
| <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) <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 |
| <p><i>Please explain how this change will better facilitate the relevant DCUSA Charging Objectives and concisely explain the rationale</i></p> <p>[See Guidance Note 11]</p> | |
| <p>DCUSA General Objectives</p> <p>Please tick the relevant boxes. (See Guidance Note 9)</p> | <p>Identified impact</p> |
| <input checked="" 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 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 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. | None |

Please explain how this change will better facilitate the relevant DCUSA Code objectives and concisely explain the rationale

[\[See Guidance Note 10\]](#)

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.

6 Impacts & Other Considerations

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

Please provide the main impacts so that readers have an overview of how the change proposed will affect the identified SCR/project.

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

Please tick the relevant boxes and provide any supporting information. [\[See Guidance Note 6\]](#)

Consideration of Wider Industry Impacts

Has this issue been discussed at any other industry forums? If so, please specify and provide supporting documentation

Insert text here [\[See Guidance Note 6\]](#)

Confidentiality

Insert text here [\[See Guidance Note 8\]](#)

7 Implementation

Please provide any views you have on implementation timescales [\[See Guidance Note 5\]](#)

Proposed Implementation Date

Next DCUSA release following Ofgem approval

8 Recommendations

The Code Administrator will provide a summary of any recommendations/determinations provided by the Panel in considering the initial Change Proposal. This will form part of a Final Change Report.

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 | <p>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.</p> <p>Part 1 Matter</p> <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; <p>c) it is likely to discriminate in its effects between one Party (or class of Parties) and another Party (or class of Parties);</p> <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> |