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| **DCUSA Consultation** | | At what stage is this document in the process? |
| DCP 244  DCP Title: MOP Leaving Site for Cat A Situations  *31 May 2017* | | |  | | --- | | **01 – Change Proposal** | | **02 – Consultation** | | **03 – Change Report** | | **04 – Change Declaration** | |
| **Purpose of Change Proposal:**  DCUSA Change Proposal 244 seeks to remove the DNO Intervention SLA for attending Category A jobs where the Meter Operative will not or has not remained on site and to address housekeeping issues with the DCP 195A (*Network Interventions SLA Enhancement*) legal text.  This document is a Consultation issued to DCUSA Parties and any other interested Parties in accordance with Clause 11.14 of the DCUSA seeking industry views on DCP 244. | | |
| Description: Description: YES_GREEN | The Workgroup recommends that this Change Proposal should:   * Proceed to Consultation  Parties are invited to consider the questions set in Section 10 and submit comments using the form attached as Attachment 1 to dcusa@electralink.co.uk by **05 July 2017.** The Working Group will consider the consultation responses and determine the appropriate next steps for the progression of the DCUSA Change Proposal. | |
| Description: Description: High_Impact | Impacted Parties: DNOs, IDNOs, Suppliers | |
| Description: Description: High_Impact | Impacted Clauses: 30.5. | |

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| Contact:  **Lauren Nicholls** |
| **Description: Description: email_us_go_onlineLauren.Nicholls@electralink.co.uk** |
| **Description: Description: call_us 0774 075 2779** |
| Proposer:  **Paul Morris** |
| **Description: Description: email_us_go_online paul.morris@ukpowernetworks.co.uk** |
| **Description: Description: call_us xx** |
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1. Summary

#### What

## 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 CPs to amend the Agreement with the consent of other Parties and (where applicable) the Authority.

#### Why

## If the MOP has not remained on site, the need to attend within 3 hours can be individually assessed and prioritised using existing incident prioritisation structures.

## Where Meter Operator Resources stay on site to manage safety related Category A issues the SLA provides a prioritised focus on DNO attendance.

1. Governance

#### Justification for Part 1 Matter

## The DCUSA Panel approved setting up a DCP 244 Working Group to develop these changes, which held its first meeting in July 2015. DCP 244 was classed as a Part 1 matter by the Panel and therefore will go to the Authority for determination after the voting process has completed. The justification for this classification is that this change will impact customers.

## The Working Group will use the feedback provided as part of this Consultation to further develop the change in readiness for the Change Report stage.

1. Why Change?

#### Background of DCP 244

## The purpose of the three-hour Service Level Agreement (SLA) for attendance at Category A situations is that, as the Meter Operator will be staying on site, the DNOs have agreed to a speedy attendance. It is being found that there are occasions where the Meter Operator does not remain on site, potentially after making the situation safe. DCP153 ‘Service Level Agreement for Resolving Network Operational Issues’ was initially raised in 2012 to address this issue; however, it was rejected by the Authority in September 2013. Its aim was to remove the three-hour SLA where the Meter Operator does not remain on site, to allow DNOs to prioritise their work appropriately.

## Due to the perceived benefits of the change, DCP 195 ‘Service Level Agreement for Resolving Network Operational Issues‘ was raised for consideration in December 2013 with a view to updating the DCP 153 legal text to incorporate the feedback provided by the Authority. DCP 195A was raised as an alternative to DCP 195 but sought to introduce a more prescriptive approach to the provision of information to Suppliers by DNOs regarding any DNO appointments made, rearranged or cancelled with their customer to rectify a Category B network issue. DCP 195A required information to be sent in all cases, defines how the information must be provided (i.e. by data flow) and specifies the timings. On the contrary DCP 195 left the timing and method of information exchange to be agreed between Suppliers and DNOs.

## DCP 195A was approved by the Authority in August 2014 for implementation in February 2015.

## Subsequently, DCP 244 was raised by UK Power Networks in June 2015. DCP 244 Working Group convened on two occasions, with the conclusion being that Operational Delivery Group (ODG) should develop guidance for Meter Operators to follow prior to the progression of this change. However; at the April 2017 Interventions Working Group, it was agreed for this change to revisited and consulted upon.

1. Code Specific Matters

#### Background to The Creation of DNO SLAs

## xx

1. Working Group Assessment

#### DCP 244 Working Group Assessment

* 1. The DCUSA Panel established a Working Group for DCP 244, 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.
  2. The Working Group noted that currently a risk assessment based approach is used by the MOP when determining whether or not to stay on site where there is a Category A situation. The MOP may take actions to make the situation safer but these actions will not make it safe to the extent that the incident could be addressed under the Category B timescales, i.e. it is still a significant issue but does not need to be resolved immediately. It was clarified that the intent of DCP 244 is not to downgrade these incidents to a Category B situation.
  3. It was suggested that there should be an industry wide agreed structure around the decision on whether to stay or not, so that it is clear in which instances a MOP can leave site. This could potentially be achieved by walking through the different types of Category A situations and agreeing what remedial action must be taken before the MOP can leave site for each. It was cautioned that it should be clear that if there is any doubt then the MOP should not leave site. An attendee highlighted that in some circumstances the safest thing to do may be to de-energise the site.
  4. It was noted that all market participants would need to be comfortable with the process that is agreed. The group considered that the most appropriate place to document this process would be in the Meter Operation Code of Practice Agreement (MOCOPA) Guidance for Service Termination Issues document. It was agreed that this process would need to be in place before DCP 244 is further progressed.
  5. The group noted that the best place to discuss agreeing an industry wide process for circumstances in which the MOP can leave the site of a Category A situation would be the Operation Delivery Group (ODG). This group has been specifically formed to gather interested parties (DNOs, Suppliers, MOPs, etc…) together to agree on issues relating to the smart rollout.
  6. The Ofgem representative at the meeting confirmed that they had no concerns with an industry agreed approach, subject to it not conflicting with any parties’ responsibilities under the Electricity Safety, Quality and Continuity Regulations (ESQCR).
  7. An attendee highlighted that in additional to safety concerns, the consumer impact also needs to be considered. It was explained that if the MOP tells the customer that there is a safety issue and then leaves the site, when the DNO arrives they may not be able to gain access and this could create a customer service issue. The Working Group members agreed that there is a significant customer service element to this topic, which requires discussions with MOPs and a clear training package.
  8. It was highlighted that the proportion of Category A to Category B and Category C incidents will impact the number of meter installers needed to deliver the smart roll-out. This is because Category A situations will hold up the meter installer and delay them visiting the next customer.
  9. The change was put on hold; however, at the DCUSA Interventions Working Group on 24 April 2017, DNOs raised concerns about the circumstances in which Meter Operators leave sites for category A situations before they arrive on site. The group noted that evidence suggests that in the majority of the cases Meter Operators are able to manage the installation of meters and assess the site as being safe before leaving. Concerns relate to the fact that category A situations formally require DNO presence as they are categorised as posing a danger, including danger of death or injury to persons and/or danger of damage to or destruction of property.
  10. DNOs expressed a preference in redefining those situations whereby it can be clearly recorded that a site has been attended and made safe by a Meter Operators, thereby removing the immediate obligation for the DNO to attend the site within the existing SLA of 3 hours. The group noted that the purpose of doing so is to free up DNOs’ resources to attend those sites requiring immediate attention i.e. which cannot be made safe and/or where no meter can be installed.
  11. In discussing how this is best achieved, members considered that the creation of a separate reporting code will require significant system changes as well as a significant implementation lead time for bringing it into code. Instead, members agreed that it may potentially be more suitable and quicker to adapt the existing DCUSA definitions to reflect the proposed variations in the described scenarios above.
  12. In response to whether DCP 244 ‘MOP Leaving Site for Cat A Situations’ – previously deferred – could be revived to address the issue, members agreed that this would depend on whether the proposed solution would still meet the original intent of the DCP. The group requested that the proposer of DCP 244 (UKPN) amends the change in line of the proposed way forward. This consultations seeks views on the updated legal text.

1. Relevant Objectives

## **Assessment against the DCUSA Objectives**

## The Working Group considers that the following DCUSA Objectives are better facilitated by DCP 244.

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| **Impact of the Change Proposal on the Relevant Objectives:** | |
| Relevant Objective | Identified impact |
| General Objective One: The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks. | Positive |

## This change better facilitates this DCUSA Objectives as it enables the DNO to make improved decisions on efficiency of resource utilisation:

1. Impacts & Other Considerations

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

## 7.1 No, DCP 244 is not related to the SCR or other change proposals in other codes.

#### Consumer Impacts

7.2 This change will impact Consumers as xx.

#### Environmental Impacts

## 7.3 In accordance with DCUSA Clause 11.14.6, the Working Group assessed whether there would be a material impact on greenhouse gas emissions if DCP 244 was implemented. The Working Group did not identify any material impact on greenhouse gas emissions from the implementation of this CP.

#### Engagement with the Authority

## 7.4 Ofgem has been fully engaged throughout the development of DCP 244 as an observer of the Working Group.

1. Implementation

## The proposed implementation date for DCP 251 and DCP 252 is set to be the first standard DCUSA release following Authority Consent.

1. Legal Text

## The legal text for DCP 244 has been provided as Attachment 2.

1. Consultation Questions

## Responses, or any part thereof, can be provided in confidence. Parties are asked to clearly indicate any parts of a response that are to be treated confidentially.

## The Working Group is seeking industry views on the following consultation questions:

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| **Question Number** | **Question** |
|  | Do you understand the intent of DCP 244? |
|  | Are you supportive of the principles of DCP 244? If not, why not? |
|  | Do you believe there will be any unintended consequences of the implementation of DCP 244? |
|  | Are there any alternative solutions or matters that should be considered? If yes, please describe these. |
|  | The proposed implementation date is the first standard release following Authority consent, do you agree with this? If not, why not? |
|  | Do you have any comments on the legal drafting? |
|  | Do you have any further comments? |

## Responses should be submitted using Attachment 1 to dcusa@electralink.co.uk no later than, 5 July 2017.

#### Attachments

* Attachment 1 – Response Form
* Attachment 2 – DCP 244 Legal Text