

DCP 304 Collated Consultation responses

Company	Confidential/ Anonymous	1. Do you understand the intent of the DCP304?	Working Group Comments
<p>Response Summary:</p> <p>All eleven respondents understood the intent of DCP 304, with two respondents stating that the intention had benefits to Suppliers and customers.</p>			
British Gas	Non-confidential	Yes	Noted
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.	Noted
Electricity North West	Non-confidential	We understand the intent of DCP 304.	Noted
Npower	Non-confidential	Yes	Noted
Northern Powergrid	Non-confidential	Yes	Noted
Scottish Power	Non-confidential	We understand what DCP 304 is trying to achieve	Noted
SP Energy	Non-confidential	Yes	Noted
SSE	Non-confidential	Yes	Noted
SSEN	Non-confidential	We fully understand the intent of DCP304.	Noted

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.	Noted
Western Power	Non-confidential	Yes	Noted

Company	Confidential/ Anonymous	2. Are you supportive of the principles of the DCP304? If not, why not?	Working Group Comments
<p>Response Summary:</p> <p>Seven respondents were supportive of the principles of DCP304, with four respondents giving qualified support or remaining neutral.</p>			
British Gas	Non-confidential	Yes, we believe this will support the smart meter roll-out	Noted
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	<p>The Group noted this response and suggested that the response was predicated by the fact that you can trace the Meter Operator by looking at the seals for the agents IDs. It was noted that there could be issues with moving advanced / HH metering and a question was raised as to whether it should cover just whole current metering.</p> <p>Action 01 – KW to keep scope of CP and revise to ensure it doesn't capture the larger metering equipment</p>

		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.	Noted
Npower	Non-confidential	Npower are supportive of the principles of the DCP 304.	Noted
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.	Noted
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	The Group noted this response and agreed that the MOp would be required to follow the existing requirements / accreditations. It was considered whether a higher level of competency would be required to work on looped neutrals, to which a member suggested that it is their company policy to train all of its operatives to work on looped neutrals.
SP Energy	Non-confidential	Yes	Noted
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.	The Group noted this response and agreed that the intention of the DCP was to enable minimal meter moves to occur, which would not require a

		<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>notification to be issued to the Supplier. It was queried whether tamper alerts would be sent to the Supplier or whether there was a potential to affect the meters signals, to which it was agreed that no impacts were expected.</p> <p>The Group discussed whether guidance should be provided as to what constitutes minimal meter moves, which should be captured as part of the legal review.</p> <p>In terms of the priority services register, it was queried whether there is a requirement to check if a customer is on their priority services register if they may lose supply. DCUSA (52H2) requires good industry practice to be adhered to, which would not be facilitated if the priority services register was not checked.</p>
SSEN	Non-confidential	We are supportive of this proposed change.	Noted
UK Power Networks	Non-confidential	Yes we are supportive of the arrangements.	Noted

Western Power	Non-confidential	<p>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:</p> <p>(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.</p> <p>(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.</p> <p>(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.</p> <p>(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.</p>	<p>The Group reviewed each of the points and agreed on the below:</p> <ul style="list-style-type: none"> A) It was agreed for the definitions to be provided by the DCUSA Legal Advisors as part of the review process B) This change mentions isolators as you may want to de-energise the asset to fit an isolate. C) This change does not seek to restrict electrician, to which the group agreed D) It was agreed that the work can only be conducted with the customers permission and that no rights to access would be provided by this change. E) It was noted that the Third Party Supplier would be required to send the information to the registered Supplier to ensure the relevant information is captured within the required interventions data flows. The basis of the CP may expand the remit of those Meter Operators who are authorised by multiple Suppliers, which could incentivise electricians. The precedent being set by this change was noted to be a concern. The original intent was to facilitate smart roll out. <p>Action 01 – KW to check whether the facilitation of moving isolators should be included potentially as an alternate</p>
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		<p>(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.</p> <ul style="list-style-type: none"> • 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. 	<p>F) It was agreed for the DCUSA Legal Advisor to provide a view on the mentioned clauses.</p> <p>G) It was agreed that this comment should be raised to the DCUSA Legal Advisor for consideration as it is a sensible suggestion.</p>
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		<p>(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.</p> <p>(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.</p>	
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Company	Confidential/ Anonymous	3. 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.	Working Group Comments
<p>Response Summary:</p> <p>Nine respondents believed that DCP304 will either have no effect or would only affect MOCOPA, with two respondents giving additional information.</p>			
British Gas	Non-confidential	No	Noted

E.ON	Non-confidential	<p>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?</p> <p>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.</p>	The Group agreed that there would not be an intention to notify the appointed MOps of work that has been conducted. It was agreed that the change is limited to whole current metering.
Electricity North West	Non-confidential	Apart from the MOCOPA® we do not believe this change will impact other industry codes or documents.	Noted
Npower	Non-confidential	Npower does not believe there will be any impact on other industry codes or documents, aside from MOCOPA.	Noted
Northern Powergrid	Non-confidential	No, we do not believe this change will impact codes other than MOCOPA.	Noted
Scottish Power	Non-confidential	No	Noted
SP Energy	Non-confidential	We are not aware of any industry codes that will be impacted other than MOCOPA	Noted
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.	Noted

SSEN	Non-confidential	We are not aware of any industry codes that will be impacted other than MOCOPA.	Noted
UK Power Networks	Non-confidential	None noted.	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.	Noted

Company	Confidential/ Anonymous	4. Do you believe that DCP 304 has any environmental impacts? If so, please explain and quantify the impact.	Working Group Comments
<p>Response Summary:</p> <p>All eleven respondents believed that DCP304 will have no negative environmental impact, with three respondents believing it would have a positive impact.</p>			
British Gas	Non-confidential	No	Noted
E.ON	Non-confidential	No	Noted
Electricity North West	Non-confidential	Where the work required can be completed during one visit it will have a positive impact on the environment.	Noted

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.	Noted
Northern Powergrid	Non-confidential	We are not aware of any.	Noted
Scottish Power	Non-confidential	No	Noted
SP Energy	Non-confidential	We are not aware that DCP304 has any environmental impacts.	Noted
SSE	Non-confidential	We do not believe there to be any environmental impacts.	Noted
SSEN	Non-confidential	We are not aware that DCP304 has any environmental impacts.	Noted
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.	Noted
Western Power	Non-confidential	No	Noted

Company	Confidential/ Anonymous	5. Do you believe there will be any unintended consequences of the implementation of DCP 304?.	Working Group Comments
<p>Response summary:</p> <p>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.</p>			
British Gas	Non-confidential	No	Noted
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.	The Group noted that change of measurement class has been covered, minimal movement would occur to ensure that the WAN and HAN are still maintained.
Electricity North West	Non-confidential	We do not believe DCP 304 will have any unintended consequences.	Noted
Npower	Non-confidential	No	Noted
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.	Noted

Scottish Power	Non-confidential	Yes, that the proposed changes are misinterpreted and not used only for SMART installs	Noted
SP Energy	Non-confidential	We are not aware of any unintended consequences associated with the implementation of DCP304	Noted
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.	Noted
SSEN	Non-confidential	We are not aware of any unintended consequences associated with the implementation of DCP304.	Noted
UK Power Networks	Non-confidential	No – however, the CP may enable smart meter suppliers to work closer together which should improve customer service.	Noted
Western Power	Non-confidential	<p>Yes.</p> <p>(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.</p> <p>(B) Whilst DCUSA can convey rights to Third Party Electricity Suppliers to operate and work on</p>	It was agreed that these had already been responded to.

		<p>industry equipment it does not convey any rights to access premises.</p> <p>(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.</p> <p>(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..</p>	
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Company	Confidential/ Anonymous	6. Are there any alternative solutions or matters that should be considered? If yes, please describe these.	Working Group Comments
<p>Response summary:</p> <p>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.</p>			
British Gas	Non-confidential	No	Noted
E.ON	Non-confidential	No	Noted

Electricity North West	Non-confidential	<p>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:</p> <p>Section 2A – Distributor to Supplier / Generator Relationship</p> <p>27. Meter Operation Code of Practice Agreement, as follows:</p> <p>27.1 The User shall procure that the Meter Operator Agent appointed for each Metering Point supplied by the User shall be party to the Meter Operation Code of Practice Agreement, and shall comply with the Meter Operation Code of Practice Agreement in relation to that Metering Point. In line with the Meter Operation Code of Practice Agreement, the Meter Operator Agent is only able to break the seals on and work upon metering equipment and distribution business equipment, if:</p> <p>27.1.1 at the relevant Metering Point, they are the appointed Meter Operator Agent and are instructed by the User appointed to the relevant Metering Point; or</p> <p>27.1.2 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):</p> <p>(A) minimal reposition of third party meter in communal meter position, to accommodate space for appointed smart meter installation;</p> <p>(B) work on looped neutral(s) on metering equipment;</p> <p>(C) work on a shared supply;</p> <p>(D) investigation/remedial revenue protection work; and</p> <p>(E) installation of an isolator.</p> <p>27.2 The Company shall be party to, and shall comply with, the Meter Operation Code of Practice Agreement.</p>	<p>The Group reviewed the proposed drafting and the proposer queried the intent of the drafting, which could be clarified by the DCUSA Legal Advisor. The respondent suggested that the drafting was aiming to simplify the drafting.</p> <p>It was agreed for the drafting to be considered as part of the legal drafting.</p>
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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.	The Group considered this response and the proposer suggested that the information does flow through to the registered electricity Supplier as part of the legal drafting (Section 52J1). Section 2.5.1 of MAP 15 was noted.
Northern Powergrid	Non-confidential	No, we have no alternative solutions to consider	Noted
Scottish Power	Non-confidential	No	Noted
SP Energy	Non-confidential	We are not aware of any alternative solutions.	Noted
SSE	Non-confidential	We believe that the existing solution would require further development before we would advise that an alternative solution was necessary.	Noted
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.	Noted

UK Power Networks	Non-confidential	No	Noted
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.	The Group considered this response and agreed that Cat B & C processes would need to go via the registered Supplier in line with the gas safe first processes.

Company	Confidential/ Anonymous	7. Do you foresee any system changes being required to implement DCP 304?	Working Group Comments
<p>Response summary:</p> <p>Eight respondents stated that no system changes would be required to implement DCP304, with three respondents giving information for consideration.</p>			
British Gas	Non-confidential	No	Noted
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.	The Group agreed that no changes would be required to the DTC.
Electricity North West	Non-confidential	We do not envisage any system changes as a consequence of DCP 304.	Noted
Npower	Non-confidential	No	Noted

Northern Powergrid	Non-confidential	Not from a Distribution Business perspective. No comment on Meter Operator or Supplier systems	Noted
Scottish Power	Non-confidential	No	Noted
SP Energy	Non-confidential	We are not aware of any system changes that will be required to implement this change.	Noted
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.	The respondent confirmed that they were happy with the discussions had during the meeting that addressed this comment.
SSEN	Non-confidential	We are not aware of any system changes that will be required to implement this change.	Noted
UK Power Networks	Non-confidential	No	Noted
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.	Noted

Company	Confidential/ Anonymous	8. 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?	Working Group Comments
<p>Response summary:</p> <p>Ten respondents agreed with the proposed implementation, with one respondent stating that the date does not at present appear feasible.</p>			
British Gas	Non-confidential	Yes	Noted
E.ON	Non-confidential	Yes, the stipulated timescales seem adequate.	Noted
Electricity North West	Non-confidential	This does seem a reasonable time frame for the implementation of DCP 304.	Noted
Npower	Non-confidential	Yes	Noted
Northern Powergrid	Non-confidential	Yes	Noted
Scottish Power	Non-confidential	If the proposal is accepted, then we are happy with the implementation date of June 2018	Noted
SP Energy	Non-confidential	We agree with the proposed implementation date for this change.	Noted
SSE	Non-confidential	At this stage, given the level of unknowns June 2018 does not appear feasible.	Noted
SSEN	Non-confidential	We agree with the proposed implementation date for this change.	Noted
UK Power Networks	Non-confidential	Yes	Noted

Western Power	Non-confidential	Yes	Noted
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Company	Confidential/ Anonymous	9. Do you agree that DCP 304 better facilitates the DCUSA Objectives? If not, why not?	Working Group Comments
<p>Response summary:</p> <p>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.</p>			
British Gas	Non-confidential	Yes	Noted
E.ON	Non-confidential	Yes	Noted
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.'	Noted
Npower	Non-confidential	Yes	Noted
Northern Powergrid	Non-confidential	Yes	Noted
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	Noted

SP Energy	Non-confidential	We agree that DCP304 better facilitates the DCUSA objectives.	Noted
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.	Noted
SSEN	Non-confidential	We agree that DCP304 better facilitates the DCUSA objectives, including General Objective 1 in our view.	Noted
UK Power Networks	Non-confidential	Yes, it will speed up the smart meter roll-out by improving the efficiency of installations.	Noted
Western Power	Non-confidential	Yes	Noted

Company	Confidential/ Anonymous	10. Do you have any comments on the legal drafting?	Working Group Comments
<p>Response summary:</p> <p>Seven respondents gave comments on the legal drafting, with four giving no comment.</p>			
British Gas	Non-confidential	The legal drafting requires legal review	Noted
E.ON	Non-confidential	No	Noted
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:	Noted

		<p>SCOPE OF SECTION 2E / 2F</p> <p>“...DNO/IDNO Party shall allow a Third Party Electricity Supplier Party to.../...Supplier Party shall allow a Third Party Electricity Supplier Party to...<u>break the seals on and work upon metering equipment and distribution business equipment, if:</u></p> <p><u>(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,</u></p> <p><u>(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):</u></p> <p><u>i. minimal reposition of third party meter in communal meter position, to accommodate space for appointed smart meter installation;</u></p> <p><u>ii. work on looped neutral(s) on metering equipment;</u></p> <p><u>iii. work on a shared supply;</u></p> <p><u>iv. investigation/remedial revenue protection work; and</u></p> <p><u>i.v. installation of an isolator;</u></p>	
Npower	Non-confidential	No	Noted
Northern Powergrid	Non-confidential	Yes. The wording of the scope of section 2E doesn't quite flow. Suggestion below.	Noted

		<p>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:</p> <ul style="list-style-type: none"> • 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. <p>This text is repeated in a number of places within the proposed legal drafting.</p>	
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.	It was agreed that based on the earlier conversations there may have to be an alternate solution to capture whether an isolator should be included.
SP Energy	Non-confidential	We have no comments regarding the legal drafting.	Noted
SSE	Non-confidential	We will fully review the legal drafting once the solutions of this modification have been fully considered.	Noted
SSEN	Non-confidential	We have no comments regarding the legal drafting.	Noted
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	It was agreed for the definition to be passed on for legal review.

		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	<p>Definition of "Third Party Electricity Supplier" has not been included.</p> <p>Definition of "Responsible Third Party Electricity Supplier" has not been included.</p> <p>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.</p> <p>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.</p>	Noted

Company	Confidential/ Anonymous	11. 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	Noted
E.ON	Non-confidential	No	Noted
Electricity North West	Non-confidential	No further comments to add	Noted
Npower	Non-confidential	No	Noted
Northern Powergrid	Non-confidential	No further comments	Noted
Scottish Power	Non-confidential	No	Noted
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.	Noted
SSE	Non-confidential	No	Noted
SSEN	Non-confidential	We have no further comments	Noted
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	Noted

		Supplier A on metering equipment that belongs to Supplier B.	
Western Power	Non-confidential	No	Noted