

DCP 302 Consultation Responses – Collated Comments

Company	Confidential/ Anonymous	1. Do you understand the intent of DCP 302?	Working Group Comments
<p>Response Summary:</p> <p>All eleven respondents understood the intent of DCP 302.</p>			
British Gas	Non-confidential	Yes, the intent of DCP 302 is to reclassify a Category A incident to a Category B incident where the meter operator has “made safe”	Noted
Electricity North West	Non-confidential	Yes, we understand the intent of DCP 302.	Noted
E.ON	Non-confidential	Yes	Noted
ESPE	Non-confidential	Yes	Noted
Northern Powergrid	Non-confidential	Yes	Noted
Scottish Power	Non-confidential	Yes	Noted
SP Energy Networks	Non-confidential	Yes	Noted
SSEN	Non-confidential	We fully understand the intent of DCP302.	Noted
UK Power Networks	Non-confidential	Yes, DCP 302 intends to allow DNOs to maximise their efficiency when addressing interventions by ensuring	Noted

		DNO resources are focused on genuine emergency situations within the three-hour SLA timescale.	
Western Power	Non-confidential	Yes	Noted
Confidential	Confidential	Yes	Noted

Company	Confidential/ Anonymous	2. Are you supportive of the principles of DCP 302? If not, why not?	Working Group Comments
<p>Response Summary:</p> <p>Nine respondents were supportive of the principles of DCP 302, with two respondents giving comments for consideration.</p>			
British Gas	Non-confidential	<p>Under the current DCUSA Schedule 24 drafting a DNO is obliged to attend 90% of Category A situations within 3 hours in a working day and 4 hours on any other day. Under the proposed change this would extend the amount of time a DNO is obliged to attend to 90% within 40 days where the meter operator has made safe.</p> <p>Due to the poor performance of DNOs meeting the Category A SLA we developed a process whereby we could temporarily make safe the DNO equipment to enable our operative to continue with the smart meter exchange without necessarily having to await the arrival of the DNO. This increased the efficiency of the operative and avoided undue delays to their schedule of appointments where other customers could be inconvenienced.</p> <p>When we developed our temporary make safe process it was not envisaged that this would need to be in place</p>	<p>The Working Group considered this response, noting that the proposal was raised in response to some Supplier's making situations safe and leaving site where a Category A intervention has been raised rather than remaining on site to wait for a DNO to attend. A number of circumstances were noted whereby the operative would stay on site i.e. where burning can be smelt.</p> <p>It was noted that not all DNOs supported the approach of making situations safe as they would prefer to send an operative to site to undertake the necessary work. This was counter to the majority view; however, supported the wider rationale that the site should be made safe as soon as possible.</p> <p>The Supplier members noted that their internal processes would need to be reviewed to ensure that</p>

		<p>for any great period of time. Our operatives are trained to report Category A interventions as soon as they become aware of the problem and this will invariably be at the start of the smart meter exchange process, when they carry out their risk assessment. A typical dual fuel smart meter exchange takes around 2 hours to complete and therefore reporting at the start of the process means the operative will often still be on site when the DNO attends the Category A made safe intervention request.</p> <p>Moving these made safe interventions to a category B will mean Suppliers will need to ensure that any activity that is carried out to make the DNO equipment safe to work on is robust enough to ensure it can stay in place for a minimum of 40 days and potentially longer as the SLA only covers 90% of circumstances. This increased risk will pass to Suppliers and will necessitate a review of current practices and any required modifications to procedures and materials will add additional cost to suppliers.</p> <p>Given the current performance of DNOs in meeting the Category B SLA (ranges from 63% - 99.5% Jan/Feb/Mar 2017 data) we do not support the proposal to reclassify made safe Category A interventions to Category B as this may result in many more cases of DNO owned equipment remaining un-rectified by the DNO.</p>	<p>the quality of the products being used could last the full duration i.e. 40 days and further still for exceptional circumstances whereby the DNO cannot gain access to the asset.</p> <p>It was noted that by making Category A situations safe, this would move the risk to Suppliers rather than DNOs.</p> <p>The Group concluded that the concerns raised were valid and would need to be considered during the progression of this change as well as the minimum specification of the materials to use to make an installation safe.</p>
Electricity North West	Non-confidential	We are supportive of the principles of DCP 302.	Noted
E.ON	Non-confidential	Yes	Noted

ESPE	Non-confidential	Yes, ESPE supports the principles of this change proposal. The proposal will allow for more efficient prioritisation of resources and benefit end consumers.	Noted
Northern Powergrid	Non-confidential	<p>Yes. The original intent of the categorisation of service termination issue notifications and the subsequent SLAs was to ensure the defects were dealt with in the most effective and timely manner. The generic description of a category A issue states the situation “does (or is likely to) pose a danger, including danger of death of or injury to persons and/or danger of damage to or destruction of property”. Therefore, there is an expectation that the meter operator would remain on site until the distributor arrived to take ownership of the situation.</p> <p>Current practice for some meter operators is to make the category A situation safe and leave site. Northern Powergrid understands the commercial reasons for this practice and are in favour of this action under certain conditions. Therefore, it is logical to account for this practice within DCUSA, MRA and the service termination issue guidance document.</p>	Noted
Scottish Power	Non-confidential	Yes, we are supportive of this change.	Noted
SP Energy Networks	Non-confidential	Yes	Noted
SSEN	Non-confidential	We are reluctantly supportive of the principles of this proposed change but we do however have a number of concerns that need to be resolved before we could vote in favour of implementation.	The Group considered this response, noting that the process introduced by SSEN to challenge Category A interventions had reduced their intervention rates significantly and suggested that an additional step could be inserted whereby a MOp is required to call the

		<p>The prospect of a MOp leaving site before the DNO attended site for a Category A situation was not envisaged by either the DCP153 or DCP195 working groups which developed the governance associated with the management of this issue. The view of these working groups was that for a Category A defect the MOp would remain on site until the DNO operative attended to resolve the issue or make the situation safe, hence the three hour response time. Our preference is still that the MOp should remain on site until our operatives arrive but Suppliers have been clear that they will not do this in most instances. We view this change as a pragmatic solution which recognises that once a defect has been made safe by the MOp there is no need for an “emergency attendance” by the DNO.</p> <p>We remain concerned regarding the current high level of misreporting of category A service termination defects by Suppliers MOp agents especially in situations where the MOp has made a defect/ situation safe and left site. It is important that this issue is addressed separately by Suppliers before this change is implemented otherwise it is likely that there will be a significant increase in incorrect defect reports being made (see answer to question 5).</p>	<p>DNO from site to notify the business of a Category A situation made safe. It was further suggested that some Category A codes would need to be excluded from the list of codes that can be made safe in line with the drafting of this change.</p> <p>The Group agreed that should DCP 302 be approved, a subsequent review of the guidance document would need to occur to ensure the documents are aligned.</p>
UK Power Networks	Non-confidential	<p>Yes, as per above, DCP 302 will allow DNO resources to focus on genuine emergency situations.</p> <p>The DCP will reflect what is already common practice for some MOPs - to make safe a Cat A and enable follow up work to remedy the situation. This has time and cost savings for both MOPs and DNOs resulting in</p>	Noted

		lower costs to customers as well as an all-round better experience.	
Western Power	Non-confidential	<p>No.</p> <p>(A) WPD does not agree that the Category A issue has been “made safe”. This implies that the hazard has been removed - DCUSA defines “Safe” to mean not posing a danger, including danger of death or of injury to persons and/or damage to or destruction of property. In reality the Supplier’s Agent (MOP) will have applied a measure which moderates the risk but does not eliminate it altogether. In other words “made safer” but not “made safe”.</p> <p>(B) The hazard is present in a customer’s premises, which neither the Supplier nor the DNO/IDNO has control over. Occupiers of the premises are generally not electrically competent and include minors, the mentally infirm, the curious etc. The measures WPD have seen applied to date have not included any warning labels in accordance with the safety signs regulations, nor have they been resistant to interference - typically the hazard is covered with a thin, transparent sheet of polythene.</p> <p>(C) The hazard is present on DNO/IDNO equipment and has been classed as a Category A situation, which is defined in DCUSA as a situation where the Company’s equipment does, or is likely to, pose a danger, including danger of death or of injury to persons and/or danger of damage to or destruction of property. In WPD’s opinion both the customer and the HSE would expect a responsible asset owner to deal promptly with such an issue. It is unlikely that a delay of up to 40 working days</p>	<p>The Group considered this response and agreed that the change should reflect that the situation has been made safer rather than made safe. It was noted that there are some situations that can be made safe and that the measures inserted are sometimes left by the DNO as they are deemed to be satisfactory.</p> <p>In relation to point B, the Group suggested that the occupiers of the premises should be included as a factor within the risk assessment undertaken when the operative attends site. It was agreed that a recognised process for making a site safe would need to be introduced to ensure a degree of consistency.</p> <p>The members agreed that a consistency approach across all DNOs would be required, specifically in terms of the materials that can be used to make a situation safer.</p> <p>With regard to point C, the Group highlighted that the counter view would be that the equipment had been in situ for a number of year prior to the install and had been made safer by the MOp on site and thus a further 40-day wait would not make a significant difference. The members present agreed that a collective approach to making a situation safer would be required otherwise MOps would need to stay on site.</p>

		<p>(8 calendar weeks) would be perceived to be a prompt or reasonable response.</p> <p>(D) In WPD's experience it is generally easier to gain access to customer's premises on the day the Category A issue is identified rather than at a later date. In the case of Category B situations, WPD expends a great deal of time and effort trying to contact customers by telephone, by writing multiple letters, and by cold calling at premises, and sometimes is still unable to gain access to customer's premises. WPD is concerned that the Change Proposal may result in a dangerous situation existing in a customer's premises for a protracted period of time.</p> <p>(E) WPD has sought legal advice on this matter. The advice we have been given is that the hazard would be present on DNO equipment and that as asset owner DNOs would become liable once they had been made aware of the situation. For this Change Proposal to be tolerable it would be necessary for the Suppliers to agree to indemnify the DNOs against all actions, proceedings, costs, demands, claims, expenses, liability, loss or damage arising from the actions or inactions of their Agent. This indemnity would have to extend up to the time that the DNO were able to gain access to the premises. The question of liability and indemnity has not been considered by this Change Proposal.</p> <p>(F) DCUSA Clause 30.5A.4 allows DNOs to defer resolution of a Category A situation within Category B timescales once the situation had been made safe. For this to apply the DNO would have had to have visited the premises (thereby demonstrating a prompt response to both the customer and HSE) and verified</p>	<p>By staying on site, it was noted that by staying on site there will be a knock on effect to the remaining installs due to be completed that day, which would have a larger impact on the Programme's delivery date.</p> <p>In response to point D, the Group agreed that it is easier to gain access to a customer's premises whilst the MOp is still on site or on the same day.</p> <p>In relation to the comments raised regarding liabilities and indemnities, it was agreed that further legal advice would need to be sought. On the contrary, it was noted that the proposed approach would not work in situations where a Meter Reader has reported the intervention as they cannot be expected to stay on site. It was suggested that the service termination guidance document could be updated to reflect that in some circumstances, the MOp would be choosing to leave site at their own risk as it is not advised by the DNO.</p> <p>The Group noted the comment raised in point F and queried whether the approach taken by WPD was driven from a safety or access perspective.</p> <p>The Group considered the comments in point G and noted that there is a mechanism to charge Suppliers for misreports at present. However, this may not result in Suppliers being incentivised to not misreport.</p> <p>The Group noted that the principle driver of the CP was to alleviate some of the issues the industry was facing,</p>
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		<p>that any making safe was to their satisfaction such that they would accept any consequential liability.</p> <p>(G) The principle driver for this change proposal is the high level of misreporting of Category A (and B) situations by the Supplier's Agents. For example, in our East Midlands licence area around 1 in 3 Category A situations are misreports. Analysis of the Category A & B misreports received in our East Midlands area over a one year period revealed that there was no defect present in 70% of the cases.</p> <p>Misreporting by their Agents is a matter that Suppliers do have some control over. The high level of misreporting has been sustained since Q2 2015 (when DNOs/IDNOs first started reporting this information) which suggests the current process does not offer an incentive on Suppliers to tackle this issue.</p> <p>DNOs/IDNOs have a DCUSA obligation to resolve issues with their service termination equipment in accordance with defined Service Levels. Overall the obligation is to use reasonable endeavours to comply with these Service Levels on at least 90% of occasions in each quarter. WPD is of the view that this should be counterbalanced with an obligation on Suppliers and their Agents to use reasonable endeavours to accurately report Category A and B situations on 90% of occasions within each quarter. Accordingly, the DNO resources that are currently wasted dealing with misreports could be more efficiently employed dealing with all Category A issues on the day rather than by deferring attendance and incurring risk. This approach would better meet the customer and HSE's reasonable expectations.</p>	<p>as well as to manage some of the processes that have become common practice.</p>
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Confidential	Confidential	Yes	Noted
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Company	Confidential/ Anonymous	3. Do you agree that this change should be progressed in parallel with an MRA change to amend an electricity Data Flow? If not, why not?	Working Group Comments
<p>Response Summary:</p> <p>Ten respondents agreed that this change should be progressed with MRA change to amend an electricity Data Flow. One respondent disagreed.</p>			
British Gas	Non-confidential	The intended solution is to create a new Category B interventions code and therefore an MRA change will need to be progressed to implement the solution.	Noted
Electricity North West	Non-confidential	We agree that it is sensible to ensure that the industry dataflow is amended by way of an MRA change at the same time so that the end to end industry process is complete. Consequently, an MRA change should be run in parallel with DCP 302.	Noted
E.ON	Non-confidential	Agree	Noted
ESPE	Non-confidential	Yes; a parallel change to the MRA is required to facilitate this change proposal. The process must be updated to realise the benefits of this change proposal.	Noted
Northern Powergrid	Non-confidential	Yes. The planned DCUSA authority decision date is 20th February 2018. As the MRA change will require a new B code creating in the data transfer catalogue, the MRA change will likely require the typical six month	The Group agreed with this response.

		lead time for implementation. In addition, the voting, impact assessment and appeal time spans will result in at circa two to three month time period. Therefore, the timescale from proposal to implementation will be eight to nine months, so a delay in starting the MRA change proposal until Feb 2018 will likely result in an implementation date of November 2018 at best, but a likelihood of February 2019. Therefore, both change proposals should be progressed in parallel but conditional on each other.	
Scottish Power	Non-confidential	We agree	Noted
SP Energy Networks	Non-confidential	It is imperative that this change is implemented as quickly as possible. If it was possible to implement the MRA change in parallel then we should endeavour to do so.	Noted
SSEN	Non-confidential	We support this change progressing in parallel with an appropriate MRA change. If the two do not happen in parallel it is likely that there will be a significant delay between this DCUSA change and efficient implementation due to the delay associated with a separate MRA change.	Noted
UK Power Networks	Non-confidential	Yes.	Noted
Western Power	Non-confidential	No. (A) WPD does not support the principles of this CP. (B) At the moment each Category A issue has a discrete code which informs DNO/IDNO staff about the nature of the deficiency that has been identified so that	The Group noted this response and agreed that the types of work that would have been made safer would need to be identified within the guidance document to ensure a retrograde step does not occur. The option to

		they are prepared in advance. WPD understands that the proposal is to create a single code of “Category A Made Safe” which means DNO/IDNO staff will have no clues about the nature of the deficiency that has been identified, which we believe is a retrograde step.	use notes was highlighted as an approach to minimise WPDs concerns.
Confidential	Confidential	Yes	Noted

Company	Confidential/ Anonymous	4. Do you agree that this change should be progressed in parallel amendments to the MOCOPA Service Termination Guidance Document? If not, why not?	Working Group Comments
<p>Response Summary:</p> <p>Ten respondents agreed that this change should be progressed in parallel amendments to the MOCOPA Service Termination Guidance Document. One respondent disagreed.</p>			
British Gas	Non-confidential	Yes this change should be progressed in parallel with amendments to the MOCOPA Service termination Guidance Document	Noted
Electricity North West	Non-confidential	With this being another essential component of the industry process for this activity, amendments to the MOCOPA Service Termination Guidance should be progressed in parallel with DCP 302.	Noted
E.ON	Non-confidential	Agree	Noted
ESPE	Non-confidential	Yes; the MOCOPA Guidance Document should be updated in parallel to promote consistency in practise. This should include the definition of ‘made safe’.	Noted

Northern Powergrid	Non-confidential	Yes. The guidance provided within the MOCOPA service terminations guidance document will support the circumstances and conditions where the new B code can be used as it will not be appropriate in all situations. It will provide information and guidance to DCUSA/MRA party representatives when considering their respective change proposals. In addition, to allow meter operators the time to train/brief out the changes to their operatives, the guidance should be ready at least 3 months prior to implementation.	The Group noted this response and agreed that a lead time would be sensible.
Scottish Power	Non-confidential	We agree	Noted
SP Energy Networks	Non-confidential	It is imperative that this change is implemented as quickly as possible. If it was possible to amend the MOCOPA document in parallel then we should endeavour to do so.	Noted
SSEN	Non-confidential	We support this change progressing in parallel with an appropriate MOCOPA change. If the two do not happen in parallel it is likely that there will be a significant delay between this DCUSA change and efficient implementation due to the delay associated with a separate MOCOPA change.	Noted
UK Power Networks	Non-confidential	Yes.	Noted
Western Power	Non-confidential	No. WPD does not support the principles of this CP.	Noted
Confidential	Confidential	Yes	Noted

Company	Confidential/ Anonymous	5. Do you believe there will be any unintended consequences of the implementation of DCP 302?	Working Group Comments
<p>Response Summary:</p> <p>Six respondents stated that there will be no unintended consequences from the implementation of DCP 302, with five respondents giving comments for consideration.</p>			
British Gas	Non-confidential	Given the current performance of DNOs in meeting the Category B SLA there could be an increase in situations where an operative has temporarily made safe a piece of DNO equipment but this remains in place permanently. Meter operatives should not be put in the position where they are having to take responsibility for any of the equipment owned by the DNO. Once an operative has reported a Category B intervention to the DNO the DNO should then be liable for any ongoing issues experienced as a result of damaged or exposed DNO equipment and the DNOs should improve their performance in relation to Category B interventions.	The Group noted this response and it was agreed that legal advice on this matter would need to be sought.
Electricity North West	Non-confidential	Apart from the changes already identified we do not believe there will be any other unintended consequences of the implementation of DCP 302.	Noted
E.ON	Non-confidential	No	Noted
ESPE	Non-confidential	Responsibility already sits with suppliers, and will continue to do so should this change be implemented. The change will simply enable reclassification of instances that were not intended to be captured under	Noted

		the original provision (i.e. improve efficiency). The success of DCP302 will be tied to the amendments to the MOCOPA Guidance Document and the MRA, as lack of clarity and process may create inconsistent practise across parties.	
Northern Powergrid	Non-confidential	Yes, we believe there may be unintended consequences from the implementation of DCP 302; however, the impact of these consequences can be managed. Although it is clear that significant benefits will be delivered through the implementation of this change, a risk of 'made safe' installations dropping off the radar, when entry to property proves difficult, is possible. To mitigate this risk, DNO's will need to have strong controls around management of outstanding category B notifications requiring remedial work. Ensuring that temporary shrouds over DNO service equipment are removed and service equipment repaired needs to take priority. Customer notification processes to ensure timely access shall also feature as part of the strict internal controls that should be implemented in parallel with this change.	The Group considered this response and noted that priority Category B codes could not be inserted within DCUSA but could form part of a parties internal processes.
Scottish Power	Non-confidential	No	Noted
SP Energy Networks	Non-confidential	No	Noted
SSEN	Non-confidential	We are concerned that there will be an increase in the already unacceptable level of inaccurate defect reporting by Meter Operators following the implementation of DCP302.	The Group considered this response and agreed that this risk could be mitigated by due process being followed and standardisation being introduced. In addition, it was suggested that a triage approach could

		<p>Currently when a MOp calls us to report a Category A defect we take an approach where we ask a series of questions to determine that the defect is being reported accurately. Where we feel that the situation being reported is not a Category A defect we provide guidance to the MOp advising that the defect should be reported as either a Category B defect or Category C issue.</p> <p>This change will remove the need for the MOp to call us to report a Category A situation that is to be made safe. This removes the opportunity for us to check that a report is being made correctly both in terms of there being an actual defect present or that a defect is categorised correctly.</p> <p>This can be overcome by Suppliers and MOps ensuring that they both have and apply correct policy and procedures for identifying and reporting defects accurately. If Supplier MOp agents report greater numbers of defects incorrectly this increases inefficient deployment of resources, adverse customer experiences and will most likely also result in a significant increase in the number of instances where Suppliers are charged by DNO's for misreporting.</p>	also be taken in relation to Category A situations made safer as an interim solution.
UK Power Networks	Non-confidential	No.	Noted
Western Power	Non-confidential	<p>Yes.</p> <p>(A) In WPD's experience it is generally easier to gain access to customer's premises on the day the Category A issue is identified rather than at a later date. In the case of Category B situations, WPD expends a great deal of time and effort trying to contact</p>	The Group considered this response, noting their response to point A as part of an earlier question. In relation to point B, it was noted that this would require further consideration as part of the development of the change.

		<p>customers by telephone, by writing multiple letters, and by cold calling at premises, and sometimes is still unable to gain access to customer's premises. WPD is concerned that the Change Proposal may result in a dangerous situation existing in a customer's premises for a protracted period of time</p> <p>(B) WPD understands that the proposal is to create a single code of "Category A Made Safe" which, in WPD's opinion, will make it harder to characterise misreporting for the following reasons: (i) The Supplier's Agent does not have to declare the precise nature of the defect and (ii) What is a misreport is unclear - is it that the situation has not been made sufficiently safe and therefore should have been reported as a Category A, or is it that the original hazard is not a Category A matter at all?</p>	
Confidential	Confidential	No	Noted

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>Four respondents gave alternative solutions or matters for consideration, with seven respondents offering no alternatives.</p>			
British Gas	Non-confidential	An alternative would be to define a new Category where it is clear that the Cat A has been made safe but the meter has been exchanged and this can be given higher priority than a Cat B recognising that the work carried out to make safe is only of a temporary nature.	The Group considered this response and agreed that at present, this would not be the preferred approach.

Electricity North West	Non-confidential	We are not aware of any alternative solutions that should be considered.	
E.ON	Non-confidential	No	Noted
ESPE	Non-confidential	Yes; we believe re-energisation should be considered as part of the made safe definition. This may be covered under other provisions, but ESPE would like the work group to consider whether DCUSA contains adequate provisions to ensure that a situation will not arise where a customer is off supply for longer than necessary due to re-categorisation from Category A to Category B.	The Group noted this response and agreed that a MOp would never leave a customer off supply and categorise it as a Category B situation.
Northern Powergrid	Non-confidential	Northern Powergrid are not proposing any alternative solutions, we believe this proposal is the most sensible approach to managing category A incidents that have been made safe. This proposal allows the meter operator to continue with work that has been agreed with customers and reduces the impact on DNO front line resource. Providing an excellent customer experience is key to the success of this programme, allowing meter operators to make safe what would have been a category A incident to allow the fitting of the Smart meter installation improves the service that can be provided to customers. This also allows the DNO to agree a suitable date and time to remedy the defective service equipment that suits the customer.	Noted
Scottish Power	Non-confidential	No	Noted
SP Energy Networks	Non-confidential	None has been identified at the various working groups.	Noted

SSEN	Non-confidential	We are not aware of any.	Noted
UK Power Networks	Non-confidential	N/A	Noted
Western Power	Non-confidential	<p>Yes.</p> <p>The principle driver for this Change Proposal is the high level of misreporting of Category A defects by Supplier's Agents (i.e. the Meter Operator). The Change Proposal does nothing to address Suppliers' misreporting behaviours, which have a significant negative impact on DNOs/IDNOs ability to meet the service levels and the customer's reasonable expectations. The absence of an incentive on Suppliers to drive the correct behaviours will result in considerable pressure on DNO resources as the volume of smart meter installs increases during mass rollout, and hence jeopardise their ability to meet the service levels. This would be the worse outcome for all concerned and particularly for customers. Reducing the levels of misreporting would mean that the DNO resources that are currently wasted dealing with misreports could be more efficiently employed dealing with all Category A issues on the day rather than incurring risk. This approach would better meet the customer and HSE's reasonable expectations.</p>	<p>The Group noted this response and agreed that the principle of the CP was not to address the high level of misreporting of Category A defects. This is confirmed within the consultation document and CP form.</p>
Confidential	Confidential	No	Noted

Company	Confidential/ Anonymous	7. 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>Six respondents stated that they agreed with the proposed implementation date, with five stating that the date was not viable at present.</p> <p>Working Group Response Summary:</p> <p>The Group noted the response and agreed that the initiative could be sped up by reporting these matters by telephone, which would remove the need for a subsequent MRA DTC change in line with the Category A reporting processes. It was noted that the service termination issues document would still need to be updated.</p>			
British Gas	Non-confidential	It is unlikely that an MRA change could be developed and implemented in this timescale therefore we do not support the proposed implementation date.	Noted
Electricity North West	Non-confidential	This does seem a reasonable timeframe for the implementation of DCP 302, taking into consideration the MRA change that will be required together with the amendments needed to the MOCOPA Service Termination Guidance	Noted
E.ON	Non-confidential	Yes	Noted
ESPE	Non-confidential	Yes, ESPE supports the proposed implementation date.	Noted
Northern Powergrid	Non-confidential	Yes, as Northern Powergrid are also experiencing similar issues as described by UKPN in the consultation. As this change will require a new service termination B code creating in the data transfer network, and	Noted

		therefore an MRA change, the latest date for the MRA change to be submitted is 12th October 2017 for a June 2018 implementation date. Should this date is not be achievable the next data transfer catalogue release date is November 2018 and would require the change proposal to be submitted to MRA by 7th December 2017. Therefore it is imperative that this change is progressed without delay to meet the change process deadlines and would expect the DCUSA, MRA change proposals and the MOCOPA guidance development to be progressed in parallel.	
Scottish Power	Non-confidential	We agree	Noted
SP Energy Networks	Non-confidential	If there is a requirement to make the MRA and MOCOPA changes after this date then clearly it will be end of 2018 before this change can be rolled out.	Noted
SSEN	Non-confidential	We support the anticipated implementation date provided that the associated changes can be made within this timescale to the other impacted industry codes identified. (MRA and MOCOPA).	Noted
UK Power Networks	Non-confidential	Yes	Noted
Western Power	Non-confidential	The ability to successfully implement this Change Proposal is dependent upon the acceptance of an MRA Change Proposal to vary the data flows and consequently the implementation date has to suit both code changes. The MRA generally provides at least 6 months between acceptance and implementation	Noted

		dates in order to allow parties to design and implement the associated system and business process changes.	
Confidential	Confidential	No – This should be on or after the required MRA change becoming affective, to enable the “fault made adequately safe” to be reported as a specific fault code. Alternatively, see the response to Q8 (item 2).	Noted

Company	Confidential/ Anonymous	8. Do you have any comments on the legal drafting?	Working Group Comments
<p>Response Summary:</p> <p>Six respondents gave comments on the legal drafting for consideration, with five respondents making no comment.</p> <p>Working Group Summary:</p> <p>The Group agreed for all of the suggested revisions to be legally reviewed, noting that a change to the Category A definition may be required in line with DCP 302.</p>			
British Gas	Non-confidential	<p>The current definitions of category A and B definitions in the DCUSA are:</p> <p>Category A Situation means a situation in which the Company’s Electric Lines or Electrical Plant does (or is likely to) pose a danger, including danger of death of or injury to persons and/or danger of damage to or destruction of property.</p> <p>Category B Situation means a situation in which the condition of the Company’s Electric Lines or Electrical Plant prevents metering work from being carried out or prevents a meter from being exchanged but where the situation is not a Category A Situation.</p>	The Group agreed with this response and noted that DCP 302 included amended drafting for Category B.

		The proposal does not fit with the definition of a Category B where the meter has been exchanged.	
Electricity North West	Non-confidential	<p>We believe it would be appropriate to keep the reference to a Category A Situation in the definition of a Category B Situation, for example:</p> <p>Category B means a situation in which the condition of the Company's Electric Lines or Electrical Plant prevents metering work from being carried out or prevents a meter from being exchanged but where the situation is not a Category A Situation <u>except where a Category A Situation has been made safe.</u></p>	Noted
E.ON	Non-confidential	No	Noted
ESPE	Non-confidential	No comments.	Noted
Northern Powergrid	Non-confidential	<p>Yes. We propose the words ' by the attending meter operator' are added.</p> <p>Category B Situation means a situation in which the condition of the Company's Electric Lines or Electrical Plant prevents metering work from being carried out or prevents a meter from being exchanged but where the situation is not a Category A Situation or where a Category A Situation has been made safe by</p>	Noted

		the attending meter operator.	
Scottish Power	Non-confidential	We have no comments on the legal drafting	Noted
SP Energy Networks	Non-confidential	None	Noted
SSEN	Non-confidential	We have no comments on the legal drafting.	Noted
UK Power Networks	Non-confidential	Yes, it may be preferable to amend Clause 30.5 to describe the process we wish the MOP to follow e.g. under the Cat A process, if the MOP finds a Cat A he should make safe if he can and then report it as Cat B etc.	Noted
Western Power	Non-confidential	Yes. The changes to the legal drafting have been limited solely to changing the definitions. In WPD's opinion the following issues require clarification: (A) Liability and indemnity arising from the actions or inactions of the Supplier's Agent, which extend up to the time that the DNO are able to gain access to the premises.	Noted
Confidential	Confidential	1. As worded, it could be implied the fault has been adequately and permanently rectified, and therefore the DNO does not need to attend. Acknowledging "...made temporarily safe" is not	Noted

		appropriate, perhaps it needs to be “.. made safe but needs DNO inspection” for avoidance of doubt. 2. It should have the caveat “and a suitable reporting Category B code has been made available”.	
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Company	Confidential/ Anonymous	9. Do you have any further comments?	Working Group Comments
<p>Response Summary:</p> <p>Seven respondents had no further comments to make, with four respondents giving additional comments for consideration.</p>			
British Gas	Non-confidential	<p>Safety is the key priority for British Gas. Any proposal to modify the Service Termination Guidance and the associated DCUSA SLA regime should be reviewed against the likely impact on industry operatives and public safety.</p> <p>Given the proposal is to extend the period of time that a DNO is given to rectify a piece of DNO owned and maintained equipment that has been made safe but not repaired, we do not support this proposal.</p>	The Group noted this response and suggested that the MOp should stay on site until the DNO can attend site if safety is the key priority as a counter argument.
Electricity North West	Non-confidential	This change would have a positive impact on the end to end industry process, improving the accuracy of the reporting of defects and enabling DNOs to allocate resources efficiently which ultimately demonstrates to customers that as an industry we are more ‘joined up’ resulting in a better customer experience.	Noted
E.ON	Non-confidential	No	Noted
ESPE	Non-confidential	No further comments.	Noted

Northern Powergrid	Non-confidential	Yes. The agreement and implementation of this change proposal will play a key part in the successful operational delivery of Smart Meters. Northern Powergrid believes that allowing Suppliers and their agents to make safe a situation that allows them to continue with their planned work, without the need to wait for a DNO response to a category A call improves the service provided to customers. Mass rollout will obviously bring with it an increase in both category A and B defect notifications. Allowing Suppliers or their agents to make safe, what would have been an A report, will reduce the impact on DNO front line resource, enabling DNO's to use those staff more effectively on real emergencies and supply interruptions that can potentially impact our customers more severely.	Noted
Scottish Power	Non-confidential	We fully agree with this change. Once a site has been made safe then it is not immediately dangerous therefore re-classifying these made safe instances to Cat B makes sense.	Noted
SP Energy Networks	Non-confidential	No	Noted
SSEN	Non-confidential	We have no further comments.	Noted
UK Power Networks	Non-confidential	No	Noted
Western Power	Non-confidential	No	Noted
Confidential	Confidential	No	Noted

