

Interventions Working Group Minutes

Meeting 11

24 July 2017 at 10:00

ElectraLink's Office, 10 Bloomsbury Way, Holborn, London, WC1A 2SL.

Attendee	Representing
IWG Member	
Alison Scott [AS] (teleconference)	ENWL
David Pang [DP]	UK Power Networks
Dave Wright [DW]	Npower
David Brown [Dbr]	E.ON Energy
David Brogden [DB]	SSE
Graham Brewster [GB]	Western Power Distribution
Paul Abreu [PA]	Energy Networks
Kevin Woollard [KW]	British Gas
Martin Murphy [MM]	Northern Powergrid
Rachael Williams [RW]	SPEN
Michael Walls [MW] (teleconference)	Ofgem
Secretariat	
Lauren Nicholls [LN] Chair	ElectraLink
Graham Hall [GH]	ElectraLink
Apologies	
Ian Dobson [ID]	EDF Energy
Angela Picciariello [AP]	Ofgem

1. Welcomes and Apologies

1.1 The Chair welcomed attendees to the Interventions Working Group meeting and noted the apologies.

- 1.2 The Working Group agreed to act in accordance with the terms set out in the DCUSA “Competition Law Dos and Don’ts”.

2. Minutes

- 2.1 The Group approved the minutes of the last meeting, held on 19 June 2017, as an accurate record.

3. Outstanding Actions

- 3.1 Attendees walked through the open actions. The updates on all actions are provided within Attachment 1.

4. Operational Issues, Safety and Reporting Issues

- 4.1 The Chair asked members to share any operational, safety and reporting issues.
- 4.2 A member highlighted an issue on Schneider meter boxes potentially breaking during the installation of meters on to the front of the box. It was noted that some hinges on these panels could become dangerous and it would be sensible to fix the hinges if on site fixing the doors. The recommended procedure is to replace the hinges or replace the plastic screws with metal screws. The Group suggested that this issue be discussed by the MOCOPA Working Group.

5. DCP 297 Collated Consultation Responses

- 5.1 On 14 June 2017, the Interventions Working Group issued a consultation on DCP 297, which received nine responses. The Group reviewed the responses to the sixteen questions within the DCP 297 Consultation document, with a summary of their discussions being provided within Attachment 1. In summary, the Group considered the below:

Question 1 - Do you understand the intent of DCP 297?

- 5.2 The Group discussed intent of the change as one respondent had raised potential ambiguities between the title, purpose, summary and legal text. A member clarified that the change was proposing to release DNOs from their obligations to meet the service level where Supplier’s volumes of attempted smart meter installations exceed 110% of their forecast, which would be clarified in the Change Report.

Question 2 - Are you supportive of the principles of the DCP 297? If not, why not?

- 5.3 Most of the respondents were supportive of the principles of improving customer service rather than of the way in which DCP 297 seeks to do so. A member highlighted that misreporting of faults is a big issue, with huge variances being witnessed, that need to be addressed. It was noted that Meter Operators should not be looking for DNO defects with mirrors and that potentially endless defaults could be raised without a cap, outside of the control of DNO’s. The Group agreed that NSAP need to be involved in the training of Meter Operators.

- 5.4 A member suggested that photos of specific interventions are reviewed to determine how a Supplier, Meter Operator and DNO would deal with the reported defect to gain consensus across the industry participants.
- 5.5 The Group agreed, in principle, that a proactive approach for Suppliers and DNOs to work together on the requirement to contact customers within ten days for a Category B case or Category A case made safe was preferable.
- 5.6 A member noted that D0150 does not include attempted installs, which can be problematic because the change talks about attempted installs which can include aborted attempts outside of the control of the DNO. The Group agreed that a forecast covering both installations and aborted installations would help with planning.
- 5.7 A member noted that the main problem in meeting the customers' expectations was an excessively high level of misreporting by Suppliers' Agents, with one in three Category A reports in one of their areas misreported and one in four Category B reports in another area misreported. This level of misreporting is something that Suppliers have some control over and should actively seek to address. The member noted that as the proposed change to service levels places a greater obligation upon DNOs, this should be counter-balanced with an obligation upon Suppliers and their Agents to attempt to accurately report Category A and B situations. The proposer agreed to update the legal text to introduce an obligation on Suppliers to improve their accuracy in reporting forecasted installs.

ACTION 11/01: KW to update legal text to introduce an obligation on Suppliers to improve accuracy by end of w/c 31st July 2017, which will be issued for legal review and circulated to the group.

- 5.8 The Group agreed that company policies to not work on metal clad cut outs should not be reported as a defect. The Group suggested that the Meter Operative audits should cover their adherence to the service termination guidance document.

ACTION 11/02: ElectraLink to feedback to MOCOPA regarding HQ audit and it covering service termination.

- 5.9 The Group discussed whether forecasts should include smart and legacy metering, to which it was noted that this is customer driven rollout so 100% accurate forecasts would not be able to be provided. As the New and Replacement Obligations (NRO) come into effect in August 2018, legacy metering work will reduce. The Group discussed whether the SLA should only relate to smart metering work. It was agreed that this would be unfair towards non-smart meter customers.

Question 3 - The proposer has suggested the DNOs should only be released from their obligations to meet the service level where Supplier's volumes of attempted smart meter installations exceeds 110% of their forecast. Do you agree that 110% is a reasonable limit for DNO's to be released from their obligation?

- 5.10 The Group discussed the responses to this question and noted that the 110% value was inserted in square brackets and is to be determined by the proposer during the legal text review phase. A suggestion of 102% was raised that was agreed to be considered by the proposer.

Question 4 - Please can Supplier respondents provide additional supporting justification for the change to address DNO concerns regarding inaccurate forecast.

- 5.11 The Group considered the reference to regional level aggregation improving accuracy, whereby it was suggested that the accuracy does not improve on a regional level as Suppliers are overstating, to take into account their expectation to gain customers

Question 5 - Do you believe there will be any additional benefits to the customer from the implementation of DCP 297?

- 5.12 The Group queried the supporting rationale provided by one respondent, in terms of whether the 38 complaints relating to dissatisfied customer amounted to a high percentage of complaints received. It was confirmed that it was a small percentage, and the Group noted that it may be useful to examine the complaints.

ACTION 11/03: KW to examine the thirty-eight complaints relating to dissatisfied customers, and bring to the August IWG for further discussion.

Question 6 - How does the impact of aggregated forecasts and churn affect the ability for DNOs to comply with the SLA?

- 5.13 The Group noted that UKPN's response clearly captured earlier concerns raised by DNOs regarding inaccurate forecasts and the impacts of aggregated forecasts and churn affecting the DNOs ability to comply with the SLA.

Question 7 - What impact does incorrect defect reporting by Meter Operators have on the DNOs ability to comply with the SLA?

- 5.14 The Group noted the responses received in relation to this question.

Question 8 - Do you believe the accuracy of the aggregated forecasts should be measured?

- 5.15 The Group discussed the responses received to this question. It was noted that all aborted installation attempts would also need to be captured in accordance with the legal text. The DNO members present noted that unless aborted installs were included they may never be released from their SLA obligations as their only measure is via the D0150. A member noted that all Category A and Category B interventions would need to be added to the number of smart meter installations in order to calculate the total number of attempted smart meter installations. One member noted that the Change Proposal seeks to address an issue that didn't currently exist, and didn't currently have a high level of customer complaints.

ACTION 11/04: Group to find out which aborts need to be measured for Suppliers and DNOs to work out at which point DNOs would be released from their SLA.

- 5.16 The Group noted that some Suppliers persist in not providing rollout profiles. It was also noted that BEIS reporting templates are being used rather than DCUSA templates.

ACTION 11/05: ElectraLink to issue reminder to Suppliers to provide roll out profiles.

Question 9 - What do you believe is a reasonable intervention rate to be included within the SLA, based on the intervention rates that have been witnessed?

- 5.17 The Group noted that the condition of the network does not directly correlate with the high levels of interventions reported due to the large number of misreports witnessed. DNOs present raised concerns with the assessment being undertaken by the Meter Operative (MOp) on site.
- 5.18 The proposer noted that a specific figure had not been defined but based on the response received an intervention rate between 2% - 7% would appear accurate.

Question 10 - Do you believe there will be any unintended consequences of the implementation of DCP 297?

- 5.19 The Group noted the responses received to this question.

Question 11 - Are there any alternative solutions or matters that should be considered? If yes, please describe these.

- 5.20 The Group considered each of the alternative solutions and matters provided, including the suggestion of a sliding scale mechanism as opposed to a static 2% intervention rate. It was agreed that this idea could be discussed upon further definition and research.

ACTION 11/06: ENWL to research and develop 'sliding scale' idea and bring back for further discussion.

Question 12 - Do you foresee any system changes being required to implement DCP 297?

- 5.21 The Group noted the responses with no further discussion.

Question 13 - The proposed implementation date is the first standard release following Authority consent, do you agree with this? If not, why not?

- 5.22 The Group noted the responses with no further discussion.

Question 14 - Do you agree that DCP 297 better facilitates the DCUSA Relevant Objective 1? If not, why not?

5.23 The Group noted the responses with no further discussion.

Question 15 - Do you have any comments on the legal drafting?

5.24 The Group noted several responses regarding, with the proposer agreeing to take the DCP off line for further review of the legal text.

Question 16 - Do you have any further comments?

5.25 The Group noted the comment raised in regards to the inconsistencies relating to the reporting of Category C interventions. The Group noted that it is a requirement within DCUSA to report Category C's and thus should be adhered to by all DCUSA Parties.

Conclusions

5.26 In summary, it was agreed that the proposer will send back findings by the middle of w/c 31st July 2017, with the findings to be circulated to the group.

6. DCP 297 Work Plan

6.1 The Group discussed the timetable for advancing DCP 297, noting that the DCUSA Panel meet on 16th August which would mean a submission deadline of the 9th August for the Change Report. The Group highlighted the importance of the subject, and noted that August may be difficult to collate responses and feedback because of the holiday season. It was therefore agreed that September was more favourable, with an issue date of 6th September. The updated work plan has been provided at Attachment 2.

7. DNO Audit Collated RFI Responses

7.1 On 14 June 2017, the Interventions Working Group issued a Request For Information on a proposal to expand the MOCOPA DNO HQ audit, which received ten responses. The Group reviewed the responses to the nine questions within the DCP 253 DNO Audit Proposal RFI, with a summary of their discussions being provided within Attachment 3. In summary, the Group considered the below:

Question 1 - Do you understand DCUSA Change Proposal (DCP) 253?

7.2 The Group noted the responses with no further discussion.

Question 2 - Do you accept DCP 253 permits DNOs to alter the connections to the metering?

7.3 The Group noted the responses with no further discussion.

Question 3 - Do you accept that the requirements of MOCOPA should apply equally to DNOs/iDNOs as to MOPs, as far as metering work under DCP 253 is concerned?

- 7.4 The Group reviewed the responses received to this question, considering the proposal of introducing new obligations into the DCUSA regarding training and auditing rather than MOCOPA in order to mandate DNOs. The Group noted that MOCOPA could be updated to ensure that is enforceable for DNOs, and noted that DCUSA does not contain an audit process which would provide evidence that metering work is being undertaken appropriately.
- 7.5 The Group noted that metering work other than the removal of a meter terminal covers may be undertaken by a DNO. When metering work is undertaken, it was agreed that MOCOPA should be adhered to and that the DNO HQ audit could be expanded to cover such circumstances.

Question 4 - Do you accept that DNO/IDNO compliance to MOCOPA should be checked in some way?

- 7.6 The Group considered the responses to this question and highlighted that the quality of work and security of supply are requirements within the MOCOPA. If a Meter Operator does not seal correctly, this will be recorded as a non-conformance.

Question 5 - (Assuming the answer to 4 is "Yes") Do you accept that it would difficult to organise work in progress audits?

- 7.7 The Group considered the responses to this question and discussed the viability of post installation audits, which would check that the seals had been correctly actioned and marked with waste products being removed. It was noted that this could be considered by the MOCOPA Working Group.

Question 5 - (Assuming the answer to 4 is "Yes") Do you accept that DNOs/IDNOs should be obliged to keep a record of work affecting the metering (for subsequent auditing)?

- 7.8 The Group considered the responses to this question and noted that cut-out changes are undertaken on an infrequent basis, which may not be recorded. Likewise, the meter terminals work may also not be recorded. It was noted that DNOs may not mark seals as live and neutral if they are not already marked where checks for tightness are undertaken. It was highlighted that as DNOs are not MOCOPA Operators they did not have to comply with MOCOPA Operator requirements. It was agreed that where meter tails are disturbed they should always be marked, which should be clarified within MOCOPA, alongside the number of instances in which a DNO should mark the meter tails. It was further suggested that DNOs internal audit procedures should be made available for the MOCOPA HQ Audit purposes.

ACTION 11/07: Feedback to MOCOPA to confirm that disturbed meter tails should always be marked, which should be clarified within the Code of Practice

Question 6 - (Assuming the answer to 4 is "Yes") Do you accept that an audit of the DNOs/IDNOs relevant procedures and training records would give a level of compliance checking (e.g. if added to the existing "HQ desktop" audit)?

- 7.9 The Group noted the responses with no further discussion.

Question 7 - (Assuming the answer to 4 is “Yes”) Do you accept that the MOCOPA Registration Authority should be asked to undertake this work?

7.10 The Group noted the responses with no further discussion.

Question 8 - (Assuming the answer to 4 is “Yes”) Do you have an alternative suggestion for checking the DNOs/IDNOs compliance to the MOCOPA requirements?

7.11 The Group noted the responses with no further discussion.

Question 9 - Do you have any other comments?

7.12 The Group discussed the responses to this question and noted that a D0002 is a fault investigative data flow, which DNOs may not have the resources to undertake. Thus, in some instances a D0002 does not mean a fault but rather precautionary issues may have been identified.

7.13 Finally, in relation to Meter Operators being required to check and tighten meter tails into the cut-out, the Group agreed that Meter Operatives already undertake this work and are obliged to do so under MOCOPA.

Conclusions

7.14 In summary, it was agreed that additional supporting rationale as to why the DNO HQ audit should be expanded prior to progressing a MOCOPA change, which should be feedback to the MOCOPA Working Group.

ACTION 11/08: ElectraLink to feedback to MOCOPA that post-installation audits for DNO metering work could be introduced subject to supporting evidence to justify the change being provided.

8. DCP 302 – Moving Made Safe Instances to Cat B

8.1 DCP 302 seeks to create a Category B code to report Category A incidents that have been made safe in instances where the Meter Operator has left site as the intervention has not prevented the meter from being changed. The Group considered this change and noted that the word ‘safer’ could be more appropriate than ‘safe’ in the title of the Change Proposal.

8.2 DW noted that MOCOPA would need to be liaised with during the development of this change to ensure it was supported due to its impacts on Meter Operators. The Group agreed that this would need to be discussed in full at the August IWG because the wording and terminology could potentially lead to issues.

9. DCP 302 Draft Consultation

- 9.1 The Group agreed to postpone discussion of a Draft Consultation of DCP 302 until the next meeting on 14th August 2017, with members agreeing to submit comments and additional consultation question in advance of the next meeting.

ACTION 11/09: Members to provide feedback on DCP 302 Consultation by Friday 4 August 2017.

10. Next Steps

- 10.1 The Chair confirmed the below next steps:

- DCP 297 proposer will send back legal text on DCP297 by the middle of w/c 31st July 2017, which would be circulated to the Group.
- The outputs of DCP 253 DNO Audit Proposal would be provided to MOCOPA, noting that should a party wish to raise a change to the DNO HQ audit, supporting evidence to justify the change would be required.
- Members feedback to DCP 302 consultation to be discussed fully at next IWG on 14th August 2017.
- DCP 304 consultation to be added to Agenda at IWG on 14th August 2017.

11. Any Other Business

- 11.1 The Chair queried whether the members had any other business to raise. There were no further items of business and the Chair closed the meeting.

12. Next Meeting Date

- 12.1 Members noted that the next IWG meeting will be at 10am on 14 August 2017.

13. Attachments

- Attachment 1 – DCP 297 Collated Consultation Responses
- Attachment 2 – DCP 297 Work Plan
- Attachment 3 – DNO Audit Collated RPI Responses v0.1
- Attachment 4 – DCP 302 Consultation Document v0.1
- Attachment 5 - Outstanding Actions