

**DCUSA DIF 041 Request For Information Responses – Collated Comments**

<b>Company</b>	<b>Confidential/ Anonymous</b>	<b>1. Are you aware of the issue as described within DIF 041? Please provide supporting comments</b>
<b>DNOs</b>		
Electricity North West Limited	Non-confidential	The issues described are not commonly occurring in our operating area at the present. However it can be appreciated that there is significant potential for such problems going forward and development of solutions at this time is desirable in order to eliminate or minimise future difficulties.
Northern Powergrid	Non-Confidential	Northern Powergrid is aware of the issue detailed in DIF 041. The issue was referenced in the High Court, RIMISSE case judgement and is also covered in the Electricity Safety Council's research into resistive heating at Service terminations and connections.
Scottish Power Distribution/ Scottish Power Manweb	Non-confidential	Yes
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Yes, we are aware of the issues described within DIF 041. We participate in a number of ENA working groups where this issue has been addressed, namely the RIMISSE Group and Service Termination Issues Group.
UK Power Networks	Non-confidential	Yes
Western Power Distribution	Non-confidential	Yes.

Suppliers		
EDF Energy	Non-confidential	EDF Energy is aware of the issue described within DIF 041 and supports the establishment of robust arrangements that ensure the safety our out customers and of their property.
GTC- covering ENC and IPNL	Non-confidential	To find a way forward on who can check and rectify loose connections on metering equipment
RWE npower	Non-confidential	We are aware of this issue only from the details provided within the DIF; however, the evidence is compelling for action / change to ensure safety of the consumer following DNO visits. If the tails are disturbed then, for safety, they should be checked at the meter terminals.
Scottish Power Energy retail Ltd	Non-confidential	<p>Scottish Power Energy Retail (SPERL) are fully aware that issues of safety can arise when any electrical connections are loose or are inadvertently disturbed when physical work is carried out on interconnected or physically linked metering and customer equipment. We understand that in relation to fuse insertion and withdrawal only outgoing terminals of the cut-out would be checked for tightness.</p> <p>SPERL operatives recognise and adhere to good Industry practise by undertaking a risk assessment on the general condition of electricity meter and supply point. This risk assessment would be completed where possible both before and after the operative carries out any electrical work to ensure the installation is electrically safe and secure</p>

Company	Confidential/ Anonymous	2. DNOs: Do you always ensure that the screws at the base of the meter terminal are tight before departing?
DNOs		
Electricity North West Limited	Non-confidential	Yes. Our internal standard operating practice is to remove the interconnecting cables between cut-out and meter, whenever working on the cut-out, in order that the physical condition of the cable cores can be inspected at both ends. Only those which are in an acceptable condition are re-used. In all other cases, new cabling, in the form of double insulated cable or high security inter-connector blocks are installed. It is also our policy to upgrade by replacing interconnecting cables for high security interconnecting blocks, wherever practicable. This necessitates the checking of the tightness of terminal screws of the meter.

Northern Powergrid	Non-confidential	Our existing work specifications do not require operatives to remove meter terminal covers and check tightness of connections after carrying out work on our service cut-out.
Scottish Power Distribution/ Scottish Power Manweb	Non-confidential	Not on every occasions. This would be dependent on the nature of the works and the extent to which the metering tails were “disturbed”. Also need to consider the nature of the call (i.e. smell of burning, flickering lights etc.), which would necessitate a more invasive engagement of the service position equipment.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	This is necessary practice and should be applied on all occasions the DNO moves, modifies or replaces the DNO service equipment.
UK Power Networks	Non-confidential	<p>In the interests of safety and protection of the customer we may from time to time retighten loosened meter terminals, the imperative of immediate customer protection, especially for vulnerable customers, taking priority.</p> <p>We emphasise that we wish to see formalised Supplier consent for such actions being carried out by the DNO, recognising that it is in the best interests of both Supplier and DNO to avoid delays in retightening of meter terminals and in avoiding attendance by the meter operator where neither are necessary.</p>
Western Power Distribution	Non-confidential	<p>Yes.</p> <p>WPD company policy on the inspection and testing of an LV service prior to connection states “Where metering is being re-used (e.g. following a service alteration), check the following ... e) all meter, link block and outgoing cut-out terminals are tight and that the wires are secure ...”</p>
<b>Suppliers</b>		
EDF Energy	Non-confidential	N/A

GTC- covering ENC and IPNL	Non-confidential	If GTC are called out to a fault on customer's premises the call out engineer would be asked to check ALL termination for tightness at the cut-out and associated metering equipment, if this is done we would advise the supplier the next day via data flows that the metering equipment has been worked on
RWE npower	Non-confidential	N/A
Scottish Power Energy retail Ltd	Non-confidential	N/A

Company	Confidential/ Anonymous	3. Suppliers: Are you willing to give consent to other Parties to access the various types of meters (including Dumb meters and Smart meters). Please provide your reasoning.
<b>DNOs</b>		
Electricity North West Limited	Non-confidential	As a DNO, the same question needs to be asked of us. It is as likely that mechanical manipulation of the cables which interconnect the cut-out and meter will cause loosening of the termination at the cut-out end, as it is at the meter end. Therefore, for any work on these cables, by either party, there is a need to check that both ends of the cable remain securely terminated. We would assume that consent is already given by the DNO to MOPS to check the cut-out terminations, under the umbrella of MOCOPA authorisation of operatives. Therefore a reciprocal recognition of DNO operatives' competence work on meter equipment terminals is expected without further qualification.
Northern Powergrid	Non-confidential	N/A
Scottish Power Distribution/ Scottish Power Manweb	Non-confidential	N/A
Southern Electric Power	Non-confidential	N/A

Distribution plc and Scottish Hydro Electric Power Distribution plc		
UK Power Networks	Non-confidential	N/A
Western Power Distribution	Non-confidential	N/A
<b>Suppliers</b>		
EDF Energy	Non-confidential	EDF Energy would be willing to provide consent to other parties to access the various types of meters. This is subject to assurance that those parties have been appropriately trained, and the relevant liabilities and indemnities being present within the DCUSA for the appropriate recourse to be available should parties fail to meet their obligations.
GTC- covering ENC and IPNL	Non-confidential	GTC--ENC are a IDNO
RWE npower	Non-confidential	Yes, it would make sense for the individual on site, if capable, to ensure the premises are left in a safe manner. There would need to be appropriate restrictions, controls and clear placement of liability, should this consent be granted. This would be needed to protect related supplier interests, in particular billing and settlement accuracy.
Scottish Power Energy retail Ltd	Non-confidential	On the understanding that the Party performing the work shall be a MOCOPA Operator, and approved under the MOCOPA competency arrangements, SPERL would consider approving justifiable work on the physical connection of any dumb or Smart electricity metering particularly where there is an impact on safety.
<b>Company</b>	<b>Confidential/</b>	<b>4. Do you understand the intent of the solutions to this DCUSA Issue?</b>

	Anonymous	
<b>DNOs</b>		
Electricity North West Limited	Non-confidential	Yes
Northern Powergrid	Non-confidential	Northern Powergrid fully understands the intent of the proposed solutions in reducing the risk of resistive heating at service terminations/connections.
Scottish Power Distribution/ Scottish Power Manweb	Non-confidential	Yes
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Yes, we understand the intent of the solutions proposed.
UK Power Networks	Non-confidential	Yes
Western Power Distribution	Non-confidential	Yes.  The intent is to regularise what is a customary practice. The enhanced security features on smart meters (anti-tamper alert and special screwdriver to access meter) means that this informal approach is no longer possible.
<b>Suppliers</b>		
EDF Energy	Non-confidential	EDF Energy understands the intent of the solutions to this DCUSA issue, however as noted in our responses below

		we do not believe that the solutions accurately reflect the issues pertaining to smart metering.
GTC- covering ENC and IPNL	Non-confidential	Yes as per DIF041
RWE npower	Non-confidential	Yes.
Scottish Power Energy retail Ltd	Non-confidential	Yes we fully understand the intent.

<b>Company</b>	<b>Confidential/ Anonymous</b>	<b>5. Do you agree with solutions 1-4 as set out in the options table? Please indicate whether there are any further considerations.</b>
<b>DNOs</b>		
Electricity North West Limited	Non-confidential	Yes our view is that they are suitable for consideration. Also that there are no further options worthy of consideration.
Northern Powergrid	Non-confidential	Northern Powergrid understands the 4 proposed options and our comments in relation to each are documented below. While the proposals seek to address the issue of potential resistive heating as a result of a DNO's works, they are silent on the same risks that exist when meter operators or commercial electricians carry out works which may also disturb the connections and/or meter/customer tails. With careful selection of an acceptable solution, it is entirely feasible that the same process could potentially be utilised in a universal manner to secure inspection of connections in situations where work has been undertaken at the service/meter position.
Scottish Power Distribution/ Scottish Power Manweb	Non-confidential	Yes. OPTION 1 Seems the most practical, at discussion stage. We are aware that Suppliers need to take a leading position on this however, as the equipment being discussed is either owned or operated by them in the first instance.
Southern Electric Power	Non-confidential	We understand the 4 solutions proposed and are not aware of any other reasonable option.

Distribution plc and Scottish Hydro Electric Power Distribution plc		
UK Power Networks	Non-confidential	Yes. These solutions, to varying degrees of robustness, cover the ways of overcoming this issue. In light of the RIMISSE Court Case we would prefer to have consent to retighten the metering terminals at time of conducting our service works as this is by far the most robust and lowest risk mitigation measure that can be applied. We feel that options 2 to 4 leave open the risk that the metering terminals will not be retightened or not without considerable time delay or adverse absence of supply impacts on the customer.
Western Power Distribution	Non-confidential	Yes.
<b>Suppliers</b>		
EDF Energy	Non-confidential	EDF Energy do not believe that all of the solutions are acceptable, specifically option 2 whereby the metering terminals would be left untightened for a period of time. This presents a safety risk for our customers and their property which we do not believe is acceptable. The other options are theoretically viable solutions to the problem at hand, however we do not believe that any of the solutions other than Option 1 are really feasible or cost effective. The reasons for this are detailed in our responses to the subsequent questions and are in line with the considerations set out in this paper. In regards to Option 1, EDF Energy is not aware of the existence of the type of Smart Metering Software keys that are referred to within the paper. These do not form part of the SMETS specifications for compliant smart metering equipment, and we believe that the existence of such keys would create issues in regards to CPA approval of metering equipment. As the DNO should only be working on the meter when it has been de-energised, the de-energised the meter will not be able to detect anything that would usually trigger a tampering alert to be generated, and so will be unable to send any alert. The only alert likely to be transmitted will be the last gasp alert sent to the DNO as a result of the metering point being de-energised, and which having programmed the work they should be expecting. We do not believe that the description of the issue and the solution is accurate in this regard, and that references to the



		<p>provision of Smart Meter software keys needs to be removed.</p> <p>It must also be ensured that, when carrying out any work of the type referred to, that DNOs have a robust sealing arrangement using Bowden wire and tin coated copper seals, with a unique identification number, as per MOCOPA requirements, and they undertake the appropriate safety tests following the completion of any work. Our experience is that not all of the DNOs we operate with have a robust sealing arrangement, and have been known to exchange services without checking meter terminations (as found via our internal Safety panel hearings).</p>
GTC- covering ENC and IPNL	Non-confidential	Option 1 we could state that after the distribution business (DNO & IDNO) has attended a fault at the customer's premises and request the supplier of the metering equipment to reset any security alarms (Tamper alert) that might have flagged up
RWE npower	Non-confidential	No other considerations other than perhaps a mix of the proposed solutions based on metering type i.e. a MOP presence for the more complex metering only.
Scottish Power Energy retail Ltd	Non-confidential	<p>Overarching the Options as highlighted in this RFI, existing industry processes obligates an operative to report any category A, B or C circumstance and to act accordingly.</p> <p>We would question the rationale within Option(s) 1 &amp; 2 of this RFI which makes reference to a "temporary anti-tamper alert disabling software key code". In respect to any compliant SMETS 2 Smart meter that will be utilised within the Smart rollout. SPERL currently have no intention of procuring any meter with an anti-tamper fixing that will necessitate the use of specialist tools nor would we expect the use or need for any specialist tools other than conventional sealing equipment as defined within MOCOPA. Therefore we dispute that a key code is actually required and on this bases do not believe there to be any access issue for DNOs.</p>

Company	Confidential/ Anonymous	6. Do you have a clear preference for option 1? If yes, please indicate why and whether there are any further considerations?
<b>DNOs</b>		
Electricity North West Limited	Non-confidential	Yes, this is the only option which permits the checking of the tightness of terminations at both ends of the cables at the same time, and therefore the only method by which the integrity of cables and their terminations can be confirmed. It also facilitates the most disruptive arrangement for the effected customer.

Northern Powergrid	Non-confidential	Selection of this option will require significant additional training and routine refresher training for all DNO staff and service providers. Identification, procurement, issue and control of new tooling will need to be considered. DNO staff and service providers currently undertaking service works will potentially need to be trained to deal with communications protocols and software issues associated with full range of smart meter installations. If this option were to be implemented, it is conceivable that the smart meter recording mechanism may be affected by a DNO's operations potentially resulting in a loss of revenue to the supplier. This option will also potentially require significant new operating expenditure for the whole of the DNO population of staff and service providers.
Scottish Power Distribution/ Scottish Power Manweb	Non-confidential	Yes, pending further discussion on practicalities / requirements.  The extent of what engagement will be required during de-energising and possibly re-commissioning on start-up needs to be known before we could express a specific preference. OPTION 1 is the closest to what we do at the moment, but this may well be without actual Supplier approval as such (needs must during faults etc..)
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Yes, this is our preferred option. The primary focus for us in these situations is the management of safety and delivering a high level of customer service, including cost control.  <u>Safety</u> - It is imperative that the tightness of all conductor terminations that may have been affected by work to maintain or replace our service termination equipment is checked. In our opinion this must always be carried out prior to re-energisation of the supply. Failure to undertake these checks may result in an increased fire risk.  <u>Customer Service</u> - All work we undertake should seek to minimise our impact upon the customer affected. Leaving customers off supply whilst they wait for a second visit by a Suppliers agent to attend and re-energise is not a credible solution, especially given that our staff are competent to undertake the necessary checks. All unnecessary delays to re-energisation of the supply will have the potential to impact on our ongoing and future relationship with the customer affected.  This is clearly the most economical and cost effective solution and minimises the impact for all industry parties.  Whilst there may be issues associated with smart meter tamper alerts industry processes can be developed to manage this issue.
UK Power Networks	Non-confidential	Yes.

		<p>We believe that the DNO being given formal consent by Suppliers to work on the meter would allow DNOs, within an agreed framework, to retighten the meter terminals while on site with no delay in re-energising the supply to the customer.</p>
Western Power Distribution	Non-confidential	<p>Yes.</p> <p>Option 2 is inconvenient to the customer as they would have to provide access on two separate occasions. There is an elevated risk of fire / overheating until the Supplier's agent is able to attend site and carry out a tightness check. This period may be extensive if the Supplier's Agent encounters difficulties agreeing access to the premises.</p> <p>Option 4 should be discounted on the basis that it would be unreasonable for a customer to be left off supply following completion of the DNO work. DNO staff would probably encounter a great deal of resistance (from customers) to them leaving site with the electricity supply in this state. There are also potential complications from Company obligations under Electricity (Standard of Performance) Regulations.</p> <p>Option 3 has some merit and this approach was considered during the DCP 153 / 195 Change Proposals. It was discounted due to the following perceived difficulties:</p> <ul style="list-style-type: none"> <li>• Some appointments take place at very short notice (can be a matter of hours in the case of emergencies)</li> <li>• The appointment window can be fairly wide (am / pm) which could result in a Supplier's Agents experiencing a great deal of non-productive time</li> <li>• Terminal tightening is required on completion of the DNO work. Whilst some jobs would be straightforward others would be more time consuming, possibly requiring a re-visit on another day (for example after a road opening notice is issued, or other customers "carded"). As before, this could result in a Supplier's Agents experiencing a great deal of non-productive time</li> </ul> <p>DNOs grant access to their equipment &amp; terminals in order to allow Supplier's work to be executed i.e. the Supplier's Agent (under the auspices of MOCOPA) is granted access to the DNO cut-out (and its terminals) in order to facilitate metering work. Option 1 is, to all intents and purposes, a reciprocal arrangement whereby Suppliers grant access to the meter (and its terminals) in order to facilitate DNO work.</p>

Suppliers		
EDF Energy	Non-confidential	<p>EDF Energy has a clear preference for option 1, subject to the clarification that Smart Meter software keys are not required by the DNO to complete work of the type being referred to. This is also subject to the sealing and testing arrangements referred to being in place, and the DNO operative having received the appropriate training.</p> <p>As the DNO is already on site as part of the modification/replacement of DNO servicer equipment, enabling them to ensure the safety of the supply equipment as part of that same site visit would seem to present a very low cost option, minimising the additional cost that will be passed on to our customers. It is also a preferable customer experience for all work to be completed as part of a single site visit.</p>
GTC- covering ENC and IPNL	Non-confidential	Option 1 would be our preferred option with the above addition if this is not accepted then Option 3
RWE npower	Non-confidential	<p>Yes, for simple metering this would be the most cost effective solution. The assurances mentioned in question 3 would need to be in place before this permission could be granted i.e. appropriate restrictions, controls and clear placement of liability to protect the metering accuracy for billing and settlements.</p> <p><u>Suggested Controls / Restrictions:</u></p> <ul style="list-style-type: none"> <li>- DNOs could provide a list of MPANs to suppliers of all planned work in advance of it happening, perhaps monthly?</li> <li>- DNO could notify suppliers of unplanned / emergency work a reasonable period after the event.</li> <li>- Requirement to provide supplier with information and inform of certain situations when site visits have been made e.g. a cabling error at a 3-phase supply. This could be achieved by a dataflow or other method.</li> <li>- Strict criteria for what actions the DNO can take under what circumstances. E.g. perhaps to not correct the above example without discussion with the supplier first.</li> <li>- Certain, more complex metering systems may be restricted to MOP only.</li> <li>- Ensure the metering systems are left in the same state as when the engineer arrived.</li> </ul>

		<ul style="list-style-type: none"> <li>- Sealing pliers should always be used.</li> <li>- Clear liability attributed to the relevant party for each scenario.</li> </ul> <p>A more detailed proposal would be needed to see how these controls could work in practice.</p> <p>The information controls listed above could extend to any and all DNO visits, which could be of great benefit to suppliers who wish to improve settlement accuracy.</p>
Scottish Power Energy retail Ltd	Non-confidential	SPERL's preference would be for Option 1. We believe this to be a more pragmatic option and worthy of consideration in order to meet each individual Company's duty of care.

Company	Confidential/ Anonymous	7. Do you have a clear preference for option 2? If yes, please indicate why and whether there are any further considerations?
<b>DNOs</b>		
Electricity North West Limited	Non-confidential	No. It cannot provide the complete assurance on the integrity of all cable termination, which can be achieved by adopting Option 1. It also more intrusive for the affected customer.
Northern Powergrid	Non-confidential	<p>This option is potentially the most feasible and practical solution to the issue. No significant operational changes will be required for DNO staff and service providers so it is unlikely that there will be a significant increase in operating costs for the DNOs. Putting in place a mandatory timescale such that the response time is relatively short (a matter of days) could well result in this being the most practical option, so reducing risk and providing flexibility of resource programming. This option could potentially be further developed to assign agreed categorisations for responses, similar to the current smart meter responses for service position defects as part of the smart meter programme.</p> <p>If the situation on site was identified as presenting an unacceptable risk then the property could remain de-energised until such time as an urgent attendance on site had occurred with subsequent restoration of supply.</p>
Scottish Power Distribution/	Non-confidential	N/A

Scottish Power Manweb		
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	<p>No - this is not a credible option in our view.</p> <p>The risk associated with re-energisation of the supply when all affected terminations have not been checked is unacceptable. Adopting this solution would be in contravention of ESQCR (regulation 3 (1) (b), regulation 24 (1) (b)).</p> <p>Gaining access for a second visit (by the MOp) may prove difficult or the customer may in fact prevent access. This would mean that the installation remained unchecked and therefore “at risk”.</p>
UK Power Networks	Non-confidential	No
Western Power Distribution	Non-confidential	No.
<b>Suppliers</b>		
EDF Energy	Non-confidential	EDF Energy does not believe that option 2 is a tolerable solution. Leaving the metering terminals metering terminals untightened for a period of time presents a safety risk for our customers and their property which we do not believe is acceptable.
GTC- covering ENC and IPNL	Non-confidential	No
RWE npower	Non-confidential	No, although it could be an option for more complex metering along side option 1. Which party picks up the cost of the MOP visit would need to be considered.
Scottish Power Energy retail Ltd	Non-confidential	No. SPERL consider that this would introduce a heightened safety risk. As such this course of action would be unacceptable.

Company	Confidential/ Anonymous	8. Do you have a clear preference for option 3? If yes, please indicate why and whether there are any further considerations?
<b>DNOs</b>		
Electricity North West Limited	Non-confidential	No. It cannot provide the complete assurance on the integrity of all cable termination, which can be achieved by adopting Option 1. It also more intrusive for the affected customer.
Northern Powergrid	Non-confidential	This option would in theory appear the ideal solution to this issue. However experience indicates that coordination of these activities is likely to be impractical. We can envisage scenarios where on site difficulties experienced by a DNO resulting in delays would leave the supplier or its agent unoccupied on site for an indeterminate time until the job was complete.
Scottish Power Distribution/ Scottish Power Manweb	Non-confidential	N/A
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	<p>No – in our view this would be extremely difficult to implement and would add cost. This would not provide an economic solution or deliver an appropriate level of customer service. Co-ordination between parties would be difficult to achieve and failure of either party to attend as planned would result in increased inconvenience to customers and may result in supply being withdrawn unnecessarily for an extended period of time.</p> <p>We are aware that currently few Suppliers provide a 24/7 metering service with some providing no cover at all over evenings and weekends. Under this scenario if we were to replace our service termination equipment on a Friday evening it is possible in some circumstances that the customer would not be re-energised until Monday morning. This period could be extended further over holiday periods such as Christmas, New Year or Easter. Consideration would also need to be given regarding how customers on priority service registers are managed under this scenario.</p>
UK Power Networks	Non-confidential	No

Western Power Distribution	Non-confidential	No.
<b>Suppliers</b>		
EDF Energy	Non-confidential	While option 3 mitigates the safety risks inherent in option 2, we do not believe that it is feasible to make co-operative appointments, and any technical solution that would achieve this outcome is likely to come at a significant cost that will ultimately be passed on to our customers.
GTC- covering ENC and IPNL	Non-confidential	Option 3 would be workable but would prefer Option 1 with amendments
RWE npower	Non-confidential	No, although it could be an option for more complex metering along side option 1. Which party picks up the cost of the MOP visit would need to be considered.
Scottish Power Energy retail Ltd	Non-confidential	No. This Option may deliver a satisfactory outcome. However, the coordination and logistical complexities involved in effectively managing dual visits would escalate risk liabilities and increase costs significantly and would result in a higher propensity to negatively impact customer service.

<b>Company</b>	<b>Confidential/ Anonymous</b>	<b>9. Do you have a clear preference for option 4? If yes, please indicate why and whether there are any further considerations?</b>
<b>DNOs</b>		
Electricity North West Limited	Non-confidential	No. It cannot provide the complete assurance on the integrity of all cable termination, which can be achieved by adopting Option 1. It also more intrusive for the affected customer.
Northern Powergrid	Non-confidential	This option undoubtedly presents the least risk from resistive heating. However the solution is not practical from a customer service perspective, especially in the current regulatory environment where the DNOs' levels of customer service form a significant element of the price control mechanism.
Scottish Power Distribution/	Non-confidential	N/A



Scottish Power Manweb		
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	No – this is not a credible option in our view. Leaving customers off supply until a Supplier could re-energise the supply would further damage the reputation of all industry parties. It would not provide the level of customer service that is acceptable to SSEPD. The issues associated with evening/ weekend provision of metering services by Suppliers detailed in our answer to Q8 also apply to this scenario.
UK Power Networks	Non-confidential	No
Western Power Distribution	Non-confidential	No.
<b>Suppliers</b>		
EDF Energy	Non-confidential	Again while option 4 presents a solution to the safety risks inherent in option 2, we do not believe that leaving a customer off supply for an undetermined period of time is an acceptable customer experience.
GTC- covering ENC and IPNL	Non-confidential	As per above
RWE npower	Non-confidential	No.
Scottish Power Energy retail Ltd	Non-confidential	No. Due to the adverse impact on Customers, SPERL would not support this Option.
<b>Company</b>	<b>Confidential/ Anonymous</b>	<b>10. Under Option 1, what is your preferred route for allowing DNOs access to the key code for a smart metering terminal in order to undertake the required work?</b>

DNOs		
Electricity North West Limited	Non-confidential	<p>Our preference is to replicate the principles of the self authorisation operated by MOCOPA members, which enables them to operate DNO equipment.</p> <p>This would include a system for recording the issue of any special tools required and any necessary training in respect of power down and power up routines and any necessary communication processes to allow full re-commissioning of the metering equipment.</p>
Northern Powergrid	Non-confidential	N/A
Scottish Power Distribution/ Scottish Power Manweb	Non-confidential	Further discussion required following the Suppliers declaring their preference. If OPTION 1 is the preferred OPTION then the practicalities of staff training/awareness etc would need to be teased out.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	<p>DNO's/ IDNO's would need to advise Suppliers retrospectively where the need to access metering equipment terminations arose.</p> <p>Business processes to enable this to happen will need to be developed in collaboration between affected industry parties.</p>
UK Power Networks	Non-confidential	<p>A key code should be provided to the DNO in advance for all meters.</p> <p>Failure to input the key code for this or any other reason for de-energising the supply could result in tamper and/or loss of supply messages being sent by the meter via the DCC to Suppliers and the DNO. Providing the code up front would allow DNOs to be able to undertake works without the need for additional administrative work to request the code for each meter individually and the Suppliers to send it. Having any temporary tamper or loss of supply disablement codes would enable the DNO to avoid causing incorrect loss of supply message being sent</p>

		to the DNO's Supply Fault Information Centre.
Western Power Distribution	Non-confidential	<p>DNOs and the ENA have been trying to discuss "business as usual" matters with Suppliers for some time now. Whilst there has been some progress, the matters have yet to be fully resolved.</p> <p>The BAU matters included alerts generated by DNOs i.e. tamper alerts when accessing meter terminals, and alerts generated by Suppliers Agents i.e. last gasp alert when they remove the cut-out fuse during metering work. The approach that seemed to be most favoured was for DNOs and Suppliers Agents to send a "customer appointment" dataflow to each other such that any alert triggered during that period of time could be disregarded.</p> <p>The aforementioned approach is preferred on the basis that it is not necessary for DNOs to be given the key code. These would be difficult to manage (assuming that the key codes would differ for each Supplier) due to the number of supplier parties prevalent on a DNO network.</p>
<b>Suppliers</b>		
EDF Energy	Non-confidential	As noted above EDF Energy is not aware of the existence of any such key codes, and they do not for part of the SMETS specifications for compliant smart metering. Also, as noted above as the DNO should only be working on a meter that has been de-energised there is no requirement to be able to disable tampering alerts as no such alerts will be generated by a de-energised meter. The only alert likely to be transmitted will be the last gasp alert sent to the DNO as a result of the metering point being de-energised, and which having programmed the work they should be expecting
GTC- covering ENC and IPNL	Non-confidential	GTC- are a Distribution business but Option 1 with the amendment would be preferable
RWE npower	Non-confidential	We have not been able to come up with a solution to this yet.
Scottish Power Energy retail Ltd	Non-confidential	Please refer to our response to question 6. In our opinion the complexity implied is misguided

Company	Confidential/ Anonymous	11. Are there impacts to any other industry codes?
<b>DNOs</b>		
Electricity North West Limited	Non-confidential	The adoption of Option 1 is in the spirit of the Electricity Safety Quality and Continuity Regulations and the duty of cooperation it places on all duty holders.
Northern Powergrid	Non-confidential	None known or identified.
Scottish Power Distribution Scottish Power Manweb	Non-confidential	Not that we are aware of
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	This depends upon which option is chosen however it is likely that MOCOPA could be affected.
UK Power Networks	Non-confidential	MOCOPA may be impacted.
Western Power Distribution	Non-confidential	Possibly on the MRA if the “customer appointment” dataflow approach is adopted.
<b>Suppliers</b>		
EDF Energy	Non-confidential	EDF Energy do not believe there are impacts on any other industry codes.

GTC- covering ENC and IPNL	Non-confidential	At present suppliers do not like Distribution Business carrying out work on their equipment, unfortunately if we were called out to a fault at a customer's property and a loose termination was found to be the problem we would want to rectify this at that time, if we went along with the suppliers wish it would mean that the customer would be without electricity for some time.
RWE npower	Non-confidential	Possibly the BSC, MOCOPA. Increased risk to settlements should option 1 be implemented. Controls / governance for this scheme would need to be in place, these could sit within the DCUSA, MOCOPA or BSC.
Scottish Power Energy retail Ltd	Non-confidential	Given that this is an RFI relating to dumb and smart metering installations, we believe that existing industry codes cover best practice with respect to associated safety matters. If anything the issues highlighted within this RFI may have highlighted the need to reinforce these obligations specifically around the application of best practice within existing industry codes. A review of this area may be warranted following the outcome of this RFI.

Company	Confidential/ Anonymous	12. Are there any alternative solutions or matters that should be considered?
<b>DNOs</b>		
Electricity North West Limited	Non-confidential	Option represents the least complicated and most effective way of address the issue to obtain the required technical outcome. It also in our view that this option offers the most efficient process for the customer.
Northern Powergrid	Non-confidential	A variation on Option 2 should be explored. This could potentially result in a reduction in risk from resistive heating and at the same time allow flexibility in site response times, dependant on the site conditions. The mandatory response times could be based on a risk assessment methodology with agreed categorisations to ensure that the responses are appropriate.
Scottish Power Distribution/ Scottish Power Manweb	Non-confidential	Not that we are aware of
Southern	Non-confidential	None that we are aware of.

Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc		
UK Power Networks	Non-confidential	The means for providing the key code to DNOs will need to be developed and this may therefore necessitate an impact on other codes. However the safety imperative requires that the best option for retightening of metering terminals immediately following work even if in the short to medium term false positive loss of supply messaging from smart meters has to be tolerated. In short we do not see smart metering loss of supply messaging as an impediment to improving DNO work related safety around the metering system.
Western Power Distribution	Non-confidential	Not that WPD is aware of.
<b>Suppliers</b>		
EDF Energy	Non-confidential	EDF Energy has not identified any alternative solutions. As noted in our responses above it needs to be ensured that the relevant liabilities are in place in the DCUSA to provide recourse for damages incurred as a result of work undertaken by the DNO on a Supplier's metering equipment.
GTC- covering ENC and IPNL	Non-confidential	As per item 5 with the amendment shown
RWE npower	Non-confidential	It would be helpful when coming up with a solution to understand the volumes involved per DNO, per year in terms of: <ul style="list-style-type: none"> <li>▲ whole current 1phase</li> <li>▲ whole current 3 phase</li> </ul>

		<p>▲ ct metered</p> <p>In hindsight, this would have been a great RFI question.</p>
Scottish Power Energy retail Ltd	Non-confidential	<p>SPERL'S view is that all practicable options have been identified and we do not propose or seek any alternative solution to that outlined in Option 1. However, we would suggest that there may be value in reviewing related industry processes to ensure continued best practice as part of this DCUSA issue and in determining a practicable and durable solution. Further consideration as part of this RFI should be a reporting system to ensure DNOs notify the Supplier/MOP of any work carried out on metering equipment.</p>