




| DCUSA Consultation  |  | At what stage is this document in the process? |
|---|--|--|
| <h2>DCP 304</h2> <p><b>DCP Title: Metering Works by Non-Appointed Meter Operator</b></p> <p><i>29 August 2017</i></p>   |  | 01 – Change Proposal                           |
|   |  | 02 – Consultation                              |
|   |  | 03 – Change Report                             |
|   |  | 04 – Change Declaration                        |
| <p><b>Purpose of Change Proposal:</b></p> <p>DCUSA Change Proposal 304 seeks to widen the scope of DCUSA to allow suppliers and their meter operators to break seals and work on metering equipment at metering points for which they are not the appointed meter opera</p> <p>This document is a Consultation issued to DCUSA Parties and any other interested Parties in accordance with Clause 11.14 of the DCUSA seeking industry views on DCP 304.</p> |  |  |
|    | <p>The Working Group recommends that this Change Proposal should:</p> <ul style="list-style-type: none"> <li>Proceed to Consultation</li> </ul>  |  |
|   | <p>Parties are invited to consider the questions set in Section 10 and submit comments using the form attached as Attachment 1 to <a href="mailto:dcusa@electralink.co.uk">dcusa@electralink.co.uk</a> by <b>19 September 2017</b>.</p> <p>The Working Group will consider the consultation responses and determine the appropriate next steps for the progression of the DCUSA Change Proposal.</p> |  |
|    | <p>Impacted Parties: Suppliers, DNOs and IDNOs</p>   |  |
|    | <p>Impacted Clauses: Addition of Sections 2E and 2F</p>  |  |

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| Timetable  |                  |   |
| The timetable for the progression of the Change Proposal (CP) is as follows: |                  |   |
| <b>Change Proposal timetable:</b>  |                  |   |
| Activity   | Date             |   |
| Initial Assessment Report Approved by Panel                                  | 12 July 2017     |   |
| First Consultation issued to Parties   | 29 August 2017   |   |
| Change Report issued to Panel  | 13 December 2017 |   |
| Change Report issued for Voting  | 22 December 2017 |   |
| Party Voting Ends  | 12 January 2018  |   |
| Change Declaration issued to Authority                                       | 16 January 2018  |   |
| Authority Decision   | 20 February 2018 |   |

## 1. Summary

### What

- 1.1 The Distribution Connection and Use of System Agreement (DCUSA) is a multi-party contract between electricity Distributors and electricity Suppliers and large Generators. Parties to the DCUSA can raise CPs to amend the Agreement with the consent of other Parties and (where applicable) the Authority.
- 1.2 This change seeks to widen the scope of DCUSA to allow Suppliers and their meter operators to break seals and work on metering equipment at metering points for which they are not the appointed meter operator.

### Why

- 1.3 DCP 304 seeks to allow Suppliers and their meter operators to break seals and work on metering equipment at metering points for which they are not the appointed meter operator as there are situations when it is necessary to do so.

### How

- 1.4 The intention will be to amend DCUSA to provide the necessary legal permissions to allow non-appointed meter operators to carry out metering works on metering equipment located at metering points.

## 2 Governance

### Justification for Part 1 Matter

- 2.1 The DCUSA Panel agreed for DCP 304 to be considered by a Working Group, the Interventions Working Group, which consisted of independent representatives from DNO and Supplier parties and an Ofgem observer. An open invitation was extended to all DCUSA Parties and to all other interested parties to participate in this Working Group and this invitation remains open for any interested parties. Meetings were held in open sessions and the minutes and papers of each meeting being available on the DCUSA Website – [www.dcusa.co.uk](http://www.dcusa.co.uk)
- 2.2 DCP 304 was classed as a Part 1 matter by the Panel and therefore will go to the Authority for determination after the voting process has completed. The justification for this classification is that this change will impact customers.

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

### 3 Why Change?

#### Background of DCP 304

- 3.1 The Smart Metering Implementation Programme (SMIP) is a major energy infrastructure project being led by the Department of Business, Energy and Industrial Strategy (BEIS) for the replacement or upgrade of over 50 million domestic and non-domestic electricity and gas meters by the end of 2020.
- 3.2 As the smart meter roll-out gathers pace meter operators are facing more and more situations when it would be beneficial to the efficiency of the programme if meter operators could work on metering equipment located at metering points where they are not the appointed meter operator.
- 3.3 These situations include:
- Minimal reposition of third party meter in communal meter position, to accommodate space for appointed smart meter installation;
  - Work on looped neutral(s) on metering equipment;
  - Work on a shared supply;
  - Investigation/remedial revenue protection work; and
  - Installation of an isolator;
- 3.4 DCP 127 (Gas First Smart Meter Installation) introduced the following new terms into the DCUSA:
1. An obligation for the gas/electricity supplier to ensure that work on electricity metering equipment at a customer's premises is only carried out by a MOCOPA accredited meter operator
  2. Distribution businesses permissions for the gas/electricity supplier's agent to de-energise and re-energise a customer's electricity supply for the above scenarios
  3. Electricity suppliers' permissions for the gas/electricity supplier's agent to carry out work in the above scenarios
  4. Requirements for the exchange of information relating to meter safety, damage and or interference between the distributor, gas supplier and electricity supplier

5. Gas/Electricity suppliers' indemnity requirements in favour of the distributor and electricity supplier in respect of damage caused by the gas/electricity suppliers agent
6. Confidentiality restrictions that are applicable to information exchanged between gas supplier, electricity supplier and/or distribution licensee

3.5 This proposal seeks to introduce similar terms into the DCUSA but would cover two new legal relationships:

- A legal relationship between the Registered Supplier of a metering point and Supplier whose meter operator wishes to work on that metering point
- A legal relationship between the DNO/IDNO and the Supplier whose meter operator wishes to work on that metering point

3.6 The principle of meter operators carrying out work at metering points to which they are not appointed has already been approved by parties to the MOCOPA (Meter Operator Code of Practice) subject to an equivalent change being approved to DCUSA.

## 4 Code Specific Matters

4.1 It is intended to amend the DCUSA to add new text to Section 2 to put in place the following:

1. legal relationships between the registered Electricity Supplier of a metering point and the Electricity Supplier whose meter operator wishes to carry out metering work on that metering point
2. legal relationships between the DNO/IDNO and the Electricity Supplier whose meter operator wishes to work on that metering point

4.2 Please refer to MOCOPA Change Proposal CP0090M.

## 5 Working Group Assessment

### DCP 304 Working Group Assessment

5.1 The DCUSA Panel agreed for DCP 304 to be considered by a Working Group, the Interventions Working Group, which consisted of independent representatives from DNO and Supplier parties and an Ofgem observer. An open invitation was extended to all DCUSA Parties and to all other interested parties to participate in this Working Group and this invitation remains open for any interested parties.

- 5.2 At its meeting in August 2017, the Interventions Working Group considered the implications of this change and the DCUSA Objectives it better facilitates. As a consensus could not be reached as to whether this change better facilitates the DCUSA Objectives, the Proposer's views have been put forwards within this consultation document. In addition, the Group questioned whether this proposal has any impacts on the Alternative HAN solutions that are due to be developed. As such, this consultation has been issued to the relevant industry bodies to seek feedback.
- 5.3 Finally, the Group noted the positive impact this change would have on the environment but were not able to quantify the reduction in the carbon footprint based on a reduced number of site visits so this has not been included within the assessment of the change.

## 6 Relevant Objectives

### Assessment against the DCUSA Objectives

- 6.1 The Proposer considers that the following DCUSA Objectives are better facilitated by DCP 304.

| Impact of the Change Proposal on the Relevant Objectives:  |          |
|--|----------|
| General Objective Two: The facilitation of effective competition in the generation and supply of electricity and (so far as is consistent therewith) the promotion of such competition in the sale, distribution and purchase of electricity | Positive |
| General Objective Three: The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences   | Positive |
| General Objective Five: Compliance with the Regulation on Cross-Border Exchange in Electricity and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.            | Positive |

- 6.2 The Proposer has suggested that this change better facilitates DCUSA General Objective Two by reducing the number of aborted meter work jobs where under the present circumstances meter operators would have no alternative but to abort the work and contact the Supplier whose metering installation they need to work on. This will increase the efficiency of smart meter roll out and the reduction in overall costs will have a positive impact on consumers. The Proposer has suggested that this change also better facilitates DCUSA General Objective Three as DCUSA currently provides generic permissions from distribution licensees and registered electricity suppliers to facilitate works on electricity metering at customer premises by gas suppliers and registered electricity suppliers. This change will extend those permissions to any electricity supplier and therefore improves competition in supply of electricity which will better facilitate the

efficient discharge by DNO and IDNO parties of standard licence condition 4 of the electricity distribution licence. The Proposer has suggested that this change better facilitates DCUSA General Objective Five by supporting the EU's requirement to install smart meters, as referenced in the European Smart Metering Landscape Report: *"With the requirements of Art. 13 of the so-called Energy Services Directive (2006/32/ED, ESD) and the adoption of the Directive on the internal electricity market (2009/72/EC), it became clear that the modernisation of the European meter infrastructure and the introduction of intelligent metering systems will have to happen."*

## 7 Impacts & Other Considerations

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

- 7.1 No, DCP 304 is not related to the SCR or other change proposals in other codes. However, Ofgem have mandated that all electricity suppliers must take all reasonable steps to ensure a Smart Metering System is installed at each domestic premise by 31st December 2020.
- 7.2 This change will support Suppliers in the achievement of supply licence condition 39

### Consumer Impacts

- 7.2 This change will impact Consumers as more consumers will benefit from meter operators being able to work on metering equipment located at metering points where they are not the appointed meter operator. It was also noted that this change would also reduce Consumers delays by enabling metering works to be completed on the first visit.

### Environmental Impacts

- 7.3 In accordance with DCUSA Clause 11.14.6, the Working Group assessed whether there would be a material impact on greenhouse gas emissions if DCP 304 was implemented. The Working Group did not identify any material impact on greenhouse gas emissions from the implementation of this CP.

### Engagement with the Authority

- 7.4 Ofgem has been invited to be fully engaged throughout the development of DCP 304 as Ofgem are currently a representative on the Interventions Working Group.

## 8 Implementation

- 8.1 The proposed implementation date for DCP 304 is set to be the first standard DCUSA release following Authority Consent.

## 9 Legal Text

9.1 The legal text for DCP 304 has been provided as Attachment 2.

## 10 Consultation Questions

- 10.1 Responses, or any part thereof, can be provided in confidence. Parties are asked to clearly indicate any parts of a response that are to be treated confidentially.
- 10.2 The Working Group is seeking industry views on the proposed amendments. Please provide rationale for your answers to the below questions:
- 10.3 Responses should be submitted using Attachment 1 to [dcusa@electralink.co.uk](mailto:dcusa@electralink.co.uk) no later than, xx 2017.

| Question Number | Question  |
|-----------------|---|
| 1.              | Do you understand the intent of DCP 304?  |
| 2.              | Are you supportive of the principles of DCP 304? If not, why not?   |
| 3.              | Do you believe this change will impact any other industry codes or documents, other than MOCOPA? If so, please describe the impact and the code or document that it relates to. |
| 4.              | Do you believe that DCP 304 has any environmental impacts? If so, please explain and quantify the impact.   |
| 5.              | Do you believe there will be any unintended consequences of the implementation of DCP 304?  |
| 6.              | Are there any alternative solutions or matters that should be considered? If yes, please describe these.  |
| 7.              | Do you foresee any system changes being required to implement DCP 304?  |
| 8.              | The proposed implementation date is the first standard release following Authority consent (expected to be June 2018), do you agree with this? If not, why not?                 |
| 9.              | Do you agree that DCP 304 better facilitates the DCUSA Objectives? If not, why not?   |
| 10.             | Do you have any comments on the legal drafting?   |
| 11.             | Do you have any further comments?   |

### Attachments

- Attachment 1 – Response Form

- Attachment 2 – DCP 304 Legal Text