

DCUSA DCP 253 Consultation Responses – Collated Comments

Company	Confidential/ Anonymous	1. Do you understand the intent of the DCP 253?
British Gas	Non-confidential	Yes
Electricity North West	Non-confidential	Yes.
ESP Electricity	Non-confidential	Yes, we understand the intent of DCP 253.
Northern Powergrid Northeast and Yorkshire	Non-confidential	Yes. Northern Powergrid understands that the intention of this proposal is to assist in minimising the risk posed by loose/untightened terminals at the meter position in an effective and cost efficient manner. As a result, it ensures that DNOs, Suppliers and Meter Operators deliver best value to the customer from a safety and financial perspective.
Scottish Power Energy Retail Limited (SPERL)	Non-confidential	Yes the intent of the Change is permitting DNO/IDNOs to retighten meter tails (into and out of) of a WC meter when replacing service cut-out and/or remake connections to meter terminals where necessary prior to re-energisation.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Yes.
SP Distribution plc and SP Manweb plc	Non-confidential	Yes

SSE Supply	Non-confidential	Yes
UK Power Networks	Non-confidential	Yes. UKPN has been instrumental in seeking the solution outlined in the consultation document and understands that current arrangements will provide additional cost to the customer, provide an unsatisfactory customer experience with extra visits from suppliers, additional cost borne by customers and would provide additional unnecessary safety risk.
Western Power Distribution	Non-confidential	Yes

Company	Confidential/ Anonymous	2. Are you supportive of the principles of the DCP 253?
British Gas	Non-confidential	Yes
Electricity North West	Non-confidential	Yes.
ESP Electricity	Non-confidential	Yes, we are supportive of the principles of DCP 253.
Northern Powergrid Northeast and Yorkshire	Non-confidential	Yes, in general. Northern Powergrid is supportive of the principles as this is a logical proposal to formalise an activity that would enhance customer service, safety and performance of the assets in question.
Scottish Power Energy Retail Limited (SPERL)	Non-confidential	Yes
Southern Electric Power Distribution plc and	Non-confidential	Yes, we are supportive of the principles as implementation of this proposal would overcome a significant issue which we believe requires to be addressed.

Scottish Hydro Electric Power Distribution plc		
SP Distribution plc and SP Manweb plc	Non-confidential	Yes
SSE Supply	Non-confidential	We welcome this change to better facilitate effective working on site and a reduction in additional visits that will better impact the customer.
UK Power Networks	Non-confidential	Yes. UKPN support DCP 253 as long as it is introduced as a pragmatic solution, without adding in additional communication flows and associated IT change requirements unnecessarily. Historically DNOs have accessed meters to fulfil safety requirements professionally, whilst seeking, where appropriate, to maintain or restore the customer's electricity supply.
Western Power Distribution	Non-confidential	Yes

Company	Confidential/ Anonymous	3. Do you have any comments on the proposed legal text?
British Gas	Non-confidential	No
Electricity North West	Non-confidential	None.
ESP Electricity	Non-confidential	We have no comments on the proposed legal text.
Northern Powergrid	Non-confidential	<i>'Where the Company replaces or maintains or operates Connection Equipment that provides the connection to a Metering Point measured for settlements with a whole current Metering System, the User permits the Company to access the terminals of the whole current Metering System to tighten</i>

Northeast and Yorkshire		<p><i>those terminals and if necessary remake the connections to those terminals so as to remedy possible disturbance of the connections to the whole current Metering System that may have arisen as a consequence of the Company's actions.'</i></p> <p>The legal text may need to be clearer in terms of when a DNO has permission to access the meter terminals. For example, what if a DNO arrives at a property and finds that the meter terminals appear to be loose or there are signs of overheating or arcing, before the DNO has performed any work activities. The DNO should have permission to access the meter terminals and remedy the situation as necessary.</p> <p>We do believe this is the intent of the change proposal but suggest the legal text is clearer.</p>
Scottish Power Energy Retail Limited (SPERL)	Non-confidential	No
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	<p>It is not clear if the expression 'those terminals' only refers to the incoming supply side of the meter. It seems reasonable, on the same safety grounds as for the supply side, that DNOs should also be permitted to tighten the customer side terminals and that this should be absolutely clear in the text.</p> <p>Also there may be times when it is necessary to temporarily move a meter to allow the DNO work to be undertaken, such as when a security bridge is installed. This is not covered and would still require Meter Operator attendance.</p>
SP Distribution plc and SP Manweb plc	Non-confidential	Does the legal text need to define that reference to meter terminals includes supply terminals, load terminals and ancillary wiring.
SSE Supply	Non-confidential	None

UK Power Networks	Non-confidential	<p>We believe the legal text needs a little tidying up as suggested below and this provides for both the requirements for DNO access to remake or tighten the terminals of whole current meters requested in the DCP 253 together with adequately covering the associated liability.</p> <p>25.23 In circumstances where the Company may replace, maintain or operate Connection Equipment that provides the connection to a Metering Point that is measured for settlements with a whole current Metering System, the user permits access to the terminals of the whole current Metering System to adjust those terminals and where appropriate remake the connections to those terminals to remedy possible disturbance of the connections to the whole current Metering System that may have arisen as a consequence of the Company's actions.</p>
Western Power Distribution	Non-confidential	No

Company	Confidential/Anonymous	4. Should the DNO record access to the meter and where should this information be recorded?
British Gas	Non-confidential	Should be indicated by fitting DNO specific seals to the meter cover and any other equipment disturbed, as per MOCOPA.
ENWL	Non-confidential	The re-sealing of the whole current Metering System by the DNO labelled seals will provide a record of access to the meter terminals.
ESP Electricity	Non-confidential	ESPE currently records all this information on an internal database.
Northern Powergrid Northeast and Yorkshire	Non-confidential	The decision for the DNO to record such access for its own purposes should be one for the individual. We see no reason to report information in respect of routine replacement work where there are no non-routine matters to report to the Supplier. Where there are issues of suspected meter damage or possible theft/tampering we already have reporting obligations for such issues.

Scottish Power Energy Retail Limited (SPERL)	Non-confidential	<p>Previously as part of DIF 041 we suggested that we required a reporting system to ensure DNOs notify the Supplier/MOP of any work carried out on metering equipment.</p> <p>We believe that some form of notification is required. All DNOs should supply this information to MOPs by local arrangement. From a Scottish Power/Revenue Protection perspective our preference would be to receive notification via e-mail or telephone to confirm what work has been carried out.</p>
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	<p>Yes, the information should be recorded. Each DNO will have its own method of storing the information but we are open to considering alternative approaches.</p>
SP Distribution plc and SP Manweb plc	Non-confidential	<p>All incidents within a customer's premise are recorded as part of our incident records. This includes the date, time and staff details and category of call which can be made available on request. We do not believe that notification of every access to meter terminals needs to be communicated as a matter of routine.</p>
SSE Supply	Non-confidential	<p>It is essential that the DNO records all occurrences where their staff access metering equipment for two main reasons. In smart world there will be a cumulative set of alarms that could indicate fraudulent activity has taken place, this could be ruled out with the knowledge of intervention events. Secondly there may in a small number of circumstances be damage occurring through negligence etc resulting in a fire. If the sealing equipment is missing or becomes destroyed then there is no auditable account of any activity on site by DNO parties.</p>
UK Power Networks	Non-confidential	<p>In instances where the meter seal was not available to support the last person to access the meter, DNO's recording their access to whole current electricity meters will provide information of activity and would be useful in understanding the events should there be a later incident at the property, involving the electrical apparatus and possible liability arrangements under DCUSA. Recording of the access should be logged in the DNO's work record and should be available in the event of an incident investigation on request.</p>

		DNO's would need to ensure this was adequately covered through their respective work recording processes.
Western Power Distribution	Non-confidential	Serial number on seals should be sufficient

Company	Confidential/ Anonymous	5. What if any information should be shared and when should it be shared such as post incident investigation information?
British Gas	Non-confidential	No information need be shared, unless there is some specific incident.
Electricity North West	Non-confidential	Our expectation is that if we have carried out the work, our seals should be sufficient as confirmation. My understanding is we do not see a report from MOPs each time they reseal equipment, so this would just be adding more costs to the process.
ESP Electricity	Non-confidential	The Working Group should investigate whether it would it be possible to add this information into an existing D flow in order to share out this information.
Northern Powergrid Northeast and Yorkshire	Non-confidential	DNOs already have obligations to report certain information to Suppliers under distribution licence condition 27 and under DCUSA Schedule 23. We believe that these existing reporting obligations should be sufficient.
Scottish Power Energy Retail Limited (SPERL)	Non-confidential	We believe the information should be shared within 10 days including any remedial action and observations.
Southern Electric Power Distribution	Non-confidential	It depends on whether the Meter Operators see this information as being useful for their asset management, such as knowing how many 'loose' connections, meter tails in poor condition or under

plc and Scottish Hydro Electric Power Distribution plc		sized are being found. If not, post incident investigation information would be the minimum requirement.
SP Distribution plc and SP Manweb plc	Non-confidential	Relevant detail from incident records can be made available on request, when required to support post incident investigation.
SSE Supply	Non-confidential	As a minimum; date, type of work carried out and by whom should be recorded. The DNO should be obliged to share in a reasonable timeframe (to be agreed) in the form of a flow post event so the information is readily available should a request arise. If this is held purely by the DNO then any investigative work following alarms, fraudulent activity or incidents may be delayed in sourcing the detail.
UK Power Networks	Non-confidential	If access to the meter was obtained as part the DNO works, the time and date of access would be provided together with any directly attributable information, on request from the supplier.
Western Power Distribution	Non-confidential	n/a

Company	Confidential/ Anonymous	6. What are the perceived liabilities?
British Gas	Non-confidential	Potential damage to meter. Need to ensure this is covered by DNO.
Electricity North West	Non-confidential	Consideration should be given as to whether this is already provided for in MOCOPA.
ESP Electricity	Non-confidential	We are not aware of any liabilities with the introduction of DCP 253.

Northern Powergrid Northeast and Yorkshire	Non-confidential	The value of the liabilities cannot be quantified because it will depend on the circumstances of the incident resulting from a failure to tighten the connections appropriately.
Scottish Power Energy Retail Limited (SPERL)	Non-confidential	Any poor workmanship by the DNO may result in the MOP being held responsible unless, a robust reporting procedure is implemented and all services equipment and meters were sealed by the DNO in accordance with the MACOPA guidelines
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	<p>DNOs would inevitably be involved in a (small) number of cases of accidental damage to metering equipment, which otherwise they would not have been involved with. These would likely arise from situations such as the meter terminal covers breaking on removal or replacement, or terminal screws shearing whilst being tightened. Situations such as these would require MoP attendance to rectify but DNOs should not be liable for any consequential costs.</p> <p>DNOs may also be more likely to be blamed by other parties for incidents involving damage to metering equipment when they have been the 'last party attending' such as where a third party inadvertently displaces meter tails (e.g. in a cupboard under the stairs). This risk applies to both DNOs and MoPs, as proof of 'last party attending' does not indicate that that person had left a defect.</p>
SP Distribution plc and SP Manweb plc	Non-confidential	It is possible that metering equipment may be damaged by DNO staff during this activity. This may include terminal screws being broken in situ, and it is therefore conceivable that the asset owner may seek recompense to cover repairs.
SSE Supply	Non-confidential	The liabilities are similar to not undertaking this work. Poorly tightened terminals can result in resistive heating which in turn may result in fire if left undetected. There is also a risk of reverse polarity incidents occurring due to an intervention such as replacing meter tails in conjunction with the cut-out. Adopting the procedures within MOCOPA should ensure that these are minimised to an infrequent level. This would include additional visual checks on the customer installation.
UK Power Networks	Non-confidential	The additional liabilities on the DNO relate to the events caused directly by the activity of accessing and retightening the meter tails to the same extent as the liabilities of a meter operator accessing

		the DNO service termination. In each case if follow up work on the terminals was undertaken, the future liability of the first intervention would cease.
Western Power Distribution	Non-confidential	I do not see any liability for the DNO. If the terminals are checked and the meter fails i would argue that the meter would have failed anyway. Checking the tightness of screws will reduce the number of failures. I would expect the meter operators to accept that the reduction in failures more than offsets the risk of having third parties accessing their equipment

Company	Confidential/ Anonymous	7. The Working Group proposes that DNOs cover the competency of staff under their own training arrangements i.e. in line with the relevant DNO safety rules and the applicable MOCOPA requirements. Is this appropriate?
British Gas	Non-confidential	Yes
Electricity North West	Non-confidential	Yes, this does seem an appropriate approach.
ESP Electricity	Non-confidential	Yes, we feel that this is an appropriate way to proceed.
Northern Powergrid Northeast and Yorkshire	Non-confidential	Yes, Northern Powergrid agrees that staff competency and training lies with the DNO.
Scottish Power Energy Retail Limited (SPERL)	Non-confidential	Yes, this is appropriate. It is vitally important that the DNO operative seals all metering equipment; the seal must be unique to the operative for the purposes of auditing. Assuming the DNO staff accept and comply, any instances of poor workmanship can be investigated by the MOP to trace the persons and DNO responsible. Failure to adhere to this process may negatively impact on customers who may be held responsible for meter and service position interference and any associated costs.
Southern Electric Power Distribution	Non-confidential	Yes, our staff are adequately trained and deemed competent. The additional need to tighten meter terminals is only a slight variation to the requirements for tightening cut-out terminals.

plc and Scottish Hydro Electric Power Distribution plc		
SP Distribution plc and SP Manweb plc	Non-confidential	Yes. This is an activity that is currently practised during incident response, for example, reports by the customer of flickering lights.
SSE	Non-confidential	As per question 6 above, the steps within MOCOPA are broadly aligned with supply point testing and combining both should provide the requisite checks and balances to protect the customer and their equipment.
UK Power Networks	Non-confidential	Yes. DNOs have extensive experience in working on electrical equipment and have adequate arrangements for managing the competency of their operatives to ensure they are suitably trained, taking in applicable MOCOPA® requirements.
Western Power Distribution	Non-confidential	Yes

Company	Confidential/ Anonymous	8. In the scenario where high risk metering is removed (security block) and a tamper proof arrangement is created then it will impact TRAS. Should a supplementary advice document be developed or should it be captured under MOCOPA?
British Gas	Non-confidential	Capture under MOCOPA
Electricity North West	Non-confidential	No, as it's not appropriate for DCUSA, but a guidance note issued by MOCOPA would be sensible.

ESP Electricity	Non-confidential	It is our view that this should captured under MOCOPA as they are best placed to deal with this type of information.
Northern Powergrid Northeast and Yorkshire	Non-confidential	Northern Powergrid agrees in principle to the development of arrangements to inform the Supplier that the existing security measures are no longer in place as a result of work on the DNO's asset. See response to question 11.
Scottish Power Energy Retail Limited (SPERL)	Non-confidential	SPERL do not fit security blocks and are not aware of Companies that carry out this practise. Our understanding is that sufficient information regarding instances of theft is reported to TRAS on a monthly basis. We shall also receive notification as per point 4 above.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	It may be necessary to temporarily move a meter and security block to allow DNO work to be undertaken, such as for a cut-out replacement. Following completion of the work the security block and meter would be replaced and sealed. We do consider it necessary to have a supplementary advice document or additional recording in MOCOPA.
SP Distribution plc and SP Manweb plc	Non-confidential	It is not unreasonable to expect a DNO to inform the supplier where actions taken on site affect security or theft arrangements. We believe communications between both parties already takes place where theft, abstraction or interference occurs. We believe that MOCOPA is the correct place to capture this.
SSE Supply	Non-confidential	As some DNO's are removing the service of a supply theft arrangement this would raise some concerns on how they would then handle energy theft. We would suggest in these incidents that they revert back to contacting the supplier to arrange an appropriate job. We believe this scenario should be considered by the work party in any changes made. There is a scenario that is not catered for under this proposal where a security block has been fitted. This may prevent easy access to the existing cut out which hinders a replacement. Without a significant change to the proposal, network operator staff will not be able to remove the meter to

		facilitate a cut out change. We believe to enable this scenario would mean such a variance that a new change proposal may be required to include this.
UK Power Networks	Non-confidential	UKPN understands that there may be tamper proof arrangements that they will encounter during the course of works and we believe that guidance through a supplementary advice document with visual examples would be appropriate.
Western Power Distribution	Non-confidential	Where security blocks removed the DNO/IDNO to notify Supplier

Company	Confidential/ Anonymous	9. How often would you expect to find high security TRAS arrangements on-site?
British Gas	Non-confidential	Rarely
Electricity North West	Non-confidential	We do not expect to find these arrangements on site very often.
ESP Electricity	Non-confidential	We feel that suppliers would be best placed to answer this question, as we would not be aware of how many have been installed.
Northern Powergrid Northeast and Yorkshire	Non-confidential	Northern Powergrid is unable to provide this information at this time.
Scottish Power Energy Retail Limited (SPERL)	Non-confidential	As noted above we do not use them and I am unsure of which RP service providers still use them.

Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	We cannot provide an estimate.
SP Distribution plc and SP Manweb plc	Non-confidential	We do not have records of this.
SSE Supply	Non-confidential	n/a
UK Power Networks	Non-confidential	unknown
Western Power Distribution	Non-confidential	?

Company	Confidential/ Anonymous	10. Which DCUSA General Objectives does the CP better facilitate? Please provide supporting comments. 1. The development, maintenance and operation by each of the DNO Parties and IDNO Parties of an efficient, co-ordinated, and economical Distribution System. 2. The facilitation of effective competition in the generation and supply of electricity and (so far as is consistent with that) the promotion of such competition in the sale, distribution and purchase of electricity. 3. The efficient discharge by each of the DNO Parties and IDNO Parties of the obligations imposed upon them by their Distribution Licences. 4. The promotion of efficiency in the implementation and administration of this Agreement and the arrangements under it. 5. 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.
British Gas	Non-confidential	1, 3, 4
Electricity North West	Non-confidential	Better facilitates GOs 1, 3 and 4.
ESP Electricity	Non-confidential	ESPE agree with the Working Group's opinion that DCUSA General Objectives 1 and 3 would be better facilitated by the implementation of DCP 253.
Northern Powergrid Northeast and Yorkshire	Non-confidential	<p>Northern Powergrid believes that the CP best facilitates:</p> <p>1.The development, maintenance and operation by each of the DNO Parties and IDNO Parties of an efficient, co-ordinated, and economical Distribution System.</p> <p>3. The efficient discharge by each of the DNO Parties and IDNO Parties of the obligations imposed upon them by their Distribution Licences.</p> <p>As stated, a key driver for this proposal is the potential risk posed by loose or untightened meter tail connections, either at the meter position or the service termination.</p> <p>A process by which the DNO can access both positions to check connection integrity while working on the DNO asset will provide an efficient means of reducing any risk posed.</p>

Scottish Power Energy Retail Limited (SPERL)	Non-confidential	Support the WG view - DCUSA General Objective One and three.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	In our view, this CP better facilitates General Objective 1, as, for relevant situations, it would ensure that: <ul style="list-style-type: none"> customers are left with installations which are safe, so far as is reasonably practicable (as required by the ESQCr); customers are not inconvenienced more than is necessary as a result of supply de-energisations (by whatever means); and that work is undertaken in the most efficient, co-ordinated and economic fashion – eliminating the need to send multiple parties to undertake a simple task.
SP Distribution plc and SP Manweb plc	Non-confidential	Objective 1,3 & 4
SSE Supply	Non-confidential	1 & 3
UK Power Networks	Non-confidential	1, 3, as stated in the consultation document, are we believe wholly appropriate
Western Power Distribution	Non-confidential	n/a

Company	Confidential/ Anonymous	11. Are you aware of any wider industry developments that may impact upon or be impacted by this CP?
---------	-------------------------	--

British Gas	Non-confidential	No
Electricity North West	Non-confidential	None.
ESP Electricity	Non-confidential	None at this time.
Northern Powergrid Northeast and Yorkshire	Non-confidential	Within related industry forums there have been initial discussions with regard to the development of reciprocal reporting arrangements between DNOs and Suppliers/Meter Operators to mirror the 'MOCOPA Guidance for Service Termination Issue Reporting' process. Although this is far from being considered as a proposal, there seems to be some merit with respect to a procedure for the DNO reporting Supplier equipment issues such as under size meter tails, damaged meter terminals etc.
Scottish Power Energy Retail Limited (SPERL)	Non-confidential	No
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	No
SP Distribution plc and SP Manweb plc	Non-confidential	No.
SSE Supply	Non-confidential	None that we are aware of
UK Power Networks	Non-confidential	no

Western Power Distribution	Non-confidential	No
Company	Confidential/ Anonymous	12. Do you have a preference on the date that DCP 253 is implemented into the DCUSA?
British Gas	Non-confidential	No
Electricity North West	Non-confidential	As soon as practicable.
ESP Electricity	Non-confidential	ESPE agree with the proposed implementation date of first DCUSA release following Authority consent.
Northern Powergrid Northeast and Yorkshire	Non-confidential	Northern Powergrid does not have a preference of a start date providing that staff involved in such activities can be adequately briefed based upon the current requirements of this proposal.
Scottish Power Energy Retail Limited (SPERL)	Non-confidential	Next DCUSA release date following consent.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	We see this as a safety-critical matter and would wish to see the CP implemented at the earliest possible date.

SP Distribution plc and SP Manweb plc	Non-confidential	No.
SSE Supply	Non-confidential	As soon as reasonable practical
UK Power Networks	Non-confidential	In the next DCUSA release after agreement is reached
Western Power Distribution	Non-confidential	No

Company	Confidential/ Anonymous	13. Are there any alternative solutions or matters that should be considered by the Working Group?
British Gas	Non-confidential	No
Electricity North West	Non-confidential	No.
ESP Electricity	Non-confidential	ESPE would like the Working Group to consider a system of recompense for DNOs/IDNOs where they are called out to an issue which would normally fall under the MOP's responsibilities.
Northern Powergrid Northeast and Yorkshire	Non-confidential	Northern Powergrid does not have anything further to offer at this stage.
Scottish Power Energy Retail Limited (SPERL)	Non-confidential	Not aware of any at this point.

Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	It may be beyond the scope of this CP but if possible we would wish the Working Group to consider procedures for where there is a need to remove and replace metering equipment on a temporary basis, say to replace a meter cupboard. It would be useful for this to be considered for the same reasons as shown in 10.
SP Distribution plc and SP Manweb plc	Non-confidential	We believe this change proposal is in the interest of all stakeholder parties.
SSE Supply	Non-confidential	None that we are aware of
UK Power Networks	Non-confidential	Understanding that options for solutions were explored in the previous consultation by the SIG. UKPN believes that the solution proposed is the optimum solution for all parties.
Western Power Distribution	Non-confidential	No