

DCUSA DCP 235 Consultation responses – collated comments

Company	Confidential/ Anonymous	1. Do you understand the intent of DCP 235?
Anonymous 1	Anonymous	Yes
British Gas	Non-confidential	Yes
E.ON	Non-confidential	Yes
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Yes, we fully understand the intent of this proposal.
SP Distribution / SP Manweb	Non-confidential	Yes
SSE Metering	Non-confidential	Yes we understand the intent of the change proposal
UK Power Networks	Non-confidential	Yes

Company	Confidential/ Anonymous	2. Are you supportive of the principles of DCP 235?
Anonymous 1	Anonymous	Yes.

British Gas	Non-confidential	<p>We are not supportive of the principles of D235.</p> <p>The proposer states that “enhanced asset information would allow Distribution Businesses to <u>consider</u> whether a risk based approach to service termination equipment inspection and replacement should or could be implemented.”</p> <p>The proposer has not provided any evidence as to whether a risk based approach to service termination equipment is appropriate or quantified what the benefits to consumers of this approach would be. We would want to see this before we could support this proposal. Suppliers and their agents would incur significant additional costs in collecting this information which we would expect to be passed back to distributors (See Q7 below)</p>
E.ON	Non-confidential	No. We do not support the principle. The proposal will mean smart installations will take longer, will be more costly and could impact our ability to meet smart installation targets
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	We strongly support the principles of this DCP.
SP Distribution / SP Manweb	Non-confidential	Yes
SSE Metering	Non-confidential	We are supportive of networks holding relative detail pertaining to each of their assets
UK Power Networks	Non-confidential	Yes

Company	Confidential/	3. Please provide details of the benefits to your organisation of having access to service
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	Anonymous	termination data?
Anonymous 1	Anonymous	The information collected by the implementation of DCP 235 will enable ----- to enhance its data-set for the risk assessment methodology for service terminations. The enhanced data-set means the resulting information from the risk assessment will enable ----- to more efficiently comply with its ESQCR obligations by better targeting those service terminations may require attention.
British Gas	Non-confidential	We have not identified benefits that justify the expenditure which will be incurred by British Gas complying with this proposed change. It is our view that should Ofgem consider approving this modification a full regulatory impact assessment should be carried out to demonstrate that the benefits outweigh the costs and therefore provide value to consumers.
E.ON	Non-confidential	There are no additional benefits to us as a supplier if DCP 235 was adopted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	<p>For our organisation having access to service termination data will:</p> <ul style="list-style-type: none"> • enable a different approach to be taken to the management of service termination assets including moving away from a reliance on inspection by other industry parties to a regime based upon risk. Not having this data will make the removal of the 'must inspect' supply licence condition (SLC 12.14) more difficult; • ensure that we can locate specific equipment types when the need arises to support our ongoing operation and maintenance activity; • support the development of asset replacement programmes; <p>better enable assessment of customer requests for increased capacity, particularly those associated with the connection of new low carbon technologies such as electric vehicles, heat pumps and micro generation. Having a core of information will help determine what further investigation is needed, leading to greater efficiency and improved customer service.</p>

SP Distribution / SP Manweb	Non-confidential	The Smart meter customer and industry engagement is a unique opportunity to gather or update existing DNO asset information. Access to this information provides a vital one off opportunity to assess the overall condition of the service position equipment, allowing intelligent and risk mitigating investment.
SSE Metering	Non-confidential	If this information was readily available, then by collaborative working with the network, we could proactively target customers for smart meter installs where directly there is a greater chance of a successful installation based on asset condition. We would also expect DNO's/IDNO's to schedule in their remedial work and provide data to suppliers notifying them that areas have been targeted and are now in a position where all issues have been resolved. Currently we do not know if we will encounter problems until we have arrived on site and it could be reasonably expected that the same conditions are present in the immediate area in similar property profiles.
UK Power Networks	Non-confidential	Access to service termination data will enable us to better plan inspections and replacement programmes. We can develop a risk based approach to these. We can relate events to assets and respond to correlations accordingly. If collected and reported correctly it provides a firm basis for the distributor to plan going forward and such data can be used in price controls.

Company	Confidential/ Anonymous	4. Please provide details of the impacts on your organisation of the meter operator collecting service termination data unless advised not to by the Distributor?
Anonymous 1	Anonymous	----- would expect to receive the data from the Meter Operator attending site and store the data, unless we had signalled we already have the data.
British Gas	Non-confidential	British Gas runs its own meter operator business for its residential customer base. In order to meet the proposed requirements of DCP 135 we would be impacted as follows: <ul style="list-style-type: none"> By the end of 2017 in excess of 4,000 meter operator staff would need to be trained on how

		<p>to accurately identify the 6 new data items that are proposed for the new Service Termination Equipment Information dataflow. We have calculated the investment time requirements as estimated between £1.1m to £3m dependant on the duration of initial training.</p> <ul style="list-style-type: none"> • The hand held terminal system that is used to collect and record information on site would need to be reconfigured to collect the proposed information. We have an annual update of this software and the release for November 2015 is already complete. The earliest we could implement a new release to incorporate the new data items is November 2016. At a high level we estimate the IS development to be £20k - £40k plus any changes required to handle industry flows. • We are unclear as to how the Distributor would manage the process to inform Suppliers and their agents that service termination equipment is not required. We note that the proposer has suggested amendments to the D0215 but this flow is only used in certain circumstances. How does the proposer intend to use this flow ? • We estimate that the meter operator would need to spend an additional 2-3 minutes on site to collect the required information • The additional time on site will increase the amount of time required to complete our smart meter roll-out. Based on our current published roll-out we believe an additional eleven to seventeen FTE will be required between 2016 and 2020 to ensure we achieve the smart mandate requirements. This represents an additional unbudgeted cost of £3.2m to £4.9m. <p>We have not included the additional costs that would be incurred for any third party meter operators that we use for non-domestic customers. We have assumed that meter operators will respond individually.</p>
E.ON	Non-confidential	We will incur increased installation costs. In addition there will be additional costs relating to training, system changes and storing and providing the data items
Southern Electric Power Distribution plc and	Non-confidential	We see this proposal as a very positive development which would assist us to collect information on service termination assets in an effective and efficient manner, with least disturbance to customers – something which we see as being particularly important and in the interests of all stakeholders.

Scottish Hydro Electric Power Distribution plc		
SP Distribution / SP Manweb	Non-confidential	The collected information needs to be absorbed into existing corporate systems, which will require IT adaptations to be carried out. This would not be viewed as a negative impact.
SSE Metering	Non-confidential	Our field and back office systems are not currently designed to capture and deal with this type of data. In order to facilitate the robust capture and processing of this data we will have to invest in our IT technology. This will include an element of training and auditing to ensure that any information is captured correctly. Our estimates are £100k development work for our system architecture over a 6 month period. This will create a short term solution on our current system which is being phased out and replaced so in simple terms we will be spending twice on development by also adding this to the enduring solution. At this time we do not yet understand how much time will be needed to complete this task on site but we are aware that this will impact our staffing levels as well as our mandate to install smart meters by 2020. If it takes 5 minutes to capture this detail when he hit mass rollout at 8k installs per day, we will need an additional 90 FTE to cover this activity. There will be an increase in exceptions requiring manual intervention and we predict this to incur an additional 11 FTE.
UK Power Networks	Non-confidential	<p>The impact is in being able to realise the benefits under question 3 in an efficient manner for a large population of sites.</p> <p>There would be an impact in terms of system changes to enable advising the MOP when not to gather the data. A simpler solution would be to provide the data each time the meter operator carried out an isolation from the service termination.</p>
Company	Confidential/ Anonymous	5. Please consider and comment on whether the existing meter operator competencies are sufficient to fulfil the data items being requested or whether additional training will be required to achieve this?

Anonymous 1	Anonymous	----- believes that the Meter Operative attending site will have sufficient competence to fulfil the data items due to their existing training.
British Gas	Non-confidential	We believe additional training will be needed to be able to correctly identify Cable Type and Switch / Fuse Gear Arrangement as our meter operator workforce currently does not have the level of knowledge required. The content of the training should be provided at no cost to suppliers by the DNOs to ensure consistency. We would assume the cost at between £1.1m and £3m dependant of the time required for the training.
E.ON	Non-confidential	Even if we were to assess that meter operators were competent there will always be a need for additional training so that we can ensure the specific data items that were requested were collected
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	<p>It is important to recognise that the data that has been requested falls well within the competency of existing meter operators.</p> <p>In order for a MOP to be able to operate any distributor equipment they must first satisfy distributors that they have appropriate controls in place to be able to fulfil their duties in a safe way. This includes ensuring that their operatives are trained and competent to manage all risks associated with operating distributor service termination equipment.</p> <p>Prior to being authorised to operate distributor equipment MOPs must first become MOCOPA parties and undergo a management assessment of their policies and procedures by the MOCOPA Registration Authority. They are also required to undergo operative site audits. Once they have successfully become registered as a MOCOPA party they must then seek consent from individual distributors on whose networks they wish to operate.</p> <p>This will typically, as a minimum, include the provision of their health and safety policy for review by the distributor. Within this policy, distributors would expect information relating to how the MOP will ensure the competence of their operatives to operate distributor service termination equipment, including details of training provision etc. Once the distributor is satisfied with the MOP's policy they will provide written authorisation for them to work on their networks. Given the "basic" nature of the service termination asset information being requested it is inconceivable given the above assessment that operatives will not already have the skills required to provide this information.</p> <p>At present all meter operators are required to assess the condition of the distributor's equipment as a fundamental part of their formal risk assessment procedures before they operate it.</p>

		<p>Meter operator equipment (meter tails) physically terminate inside the distributor's service termination equipment. If they are not able to identify the equipment type they will not be able to assess any associated risk of operating the individual item of apparatus.</p> <p>The DCUSA obligations which DCP195A recently placed into DCUSA require suppliers / MOP's to notify distributors when there are issues with their equipment. In order to comply with these requirements, suppliers and their MOP agents must already have substantial knowledge of distributor service termination equipment. If they do not have sufficient knowledge then there is an argument that they should not operate the distributor equipment.</p> <p>It is therefore unlikely that any additional meter operator training would therefore be required to identify and select from a small list of possible options the information being requested by distributors.</p>
SP Distribution / SP Manweb	Non-confidential	<p>The meter installer already requires a level of competence and knowledge in order to work safely on the DNO equipment. Recognising condition and type is a key existing element of the meter operator's skillset. Where required, minor changes to the MOCOPA SERVICE Terminations Issues Guide could be very easily provided.</p>
SSE Metering	Non-confidential	<p>We believe that the majority of the data items are within the scope of the operatives but some training will be required to ensure that a consistent understanding of descriptions results in clear, useful reporting.</p> <p>We don't believe the data set includes all of the relevant situations in their present guise. In MDU's where risers are terminated directly into the meter and there is no local isolation present, there is no way of capturing this type of set up. In addition, shared fuses appear to be targeted for removal from all recording activities whilst they are still creating scenarios for jobs to be aborted. We would welcome that the working group validates all scenarios are being captured adequately.</p>
UK Power Networks	Non-confidential	<p>Meter operatives should be competent to identify, gather and provide this data. An onsite risk assessment would need to take consideration of the assets in question.</p> <p>A briefing document would be required to provide guidance and ensure all meter operators received the communication and the process for recording the data via existing hand held units.</p>

Company	Confidential/ Anonymous	6. Please provide details of the costs and benefits of using the meter operator to gather service termination data?
Anonymous 1	Anonymous	----- doesn't believe that there will be any additional costs associated with the collection of the data as the Meter Operative attending site will as part of the risk assessment review the area and the service termination equipment to decide whether it is safe to carry out his/her duties. The proposed approach of the Meter Operative collecting the service termination data is the minimum cost solution for GB customers.
British Gas	Non-confidential	<p>We have estimated the impacts of collecting this information in our response to question 4 as detailed below</p> <p>British Gas runs its own meter operator business for its residential customer base. In order to meet the proposed requirements of DCP 135 we would be impacted as follows:</p> <ul style="list-style-type: none"> • By the end of 2017 in excess of 4,000 meter operator staff would need to be trained on how to accurately identify the 6 new data items that are proposed for the new Service Termination Equipment Information Flow. We have calculated the investment time requirements as estimated between £1.1m to £3m dependant on the duration of initial training. • The hand held terminal system that is used to collect and record information on site would need to be reconfigured to collect the proposed information. We have an annual update of this software and the release for November 2015 is already complete. The earliest we could implement a new release to incorporate the new data items is November 2016. At a high level we estimate the IS development to be £20k - £40k plus any changes required to handle industry flows. • We are unclear as to how the Distributor would manage the process to inform Suppliers and their agents that service termination equipment is not required. We note that the proposer has suggested amendments to the D0215 but this flow is only used in certain circumstances. How does the proposer intend to use this flow • We estimate that the meter operator would need to spend an additional 2-3 minutes on site to collect the required information

		<p>The additional time on site will increase the amount of time required to complete our smart meter roll-out. Based on our current published roll-out we believe an additional eleven to seventeen FTE will be required between 2016 and 2020 to ensure we achieve the smart mandate requirements. This represents an additional unbudgeted cost of £3.2m to £4.9m.</p> <p>We have not included the additional costs that would be incurred for any third party meter operators that we use for non-domestic customers. We have assumed that meter operators will respond individually.</p> <p>As highlighted we a full regulatory impact assessment should be carried out before placing additional obligations on Suppliers and their agents.</p>
E.ON	Non-confidential	<p>There will be an increase in cost for our meter operators due to the increase in time and the collection of data. We are currently making an internal assessment of what these costs would be. We do not consider that there is a current benefit to us as a supplier</p>
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	<p>Given the limited level of information currently available, we have not made a full assessment of the costs involved. However, the only obvious additional costs involved are minor, arising from recording and transferring the information. Intuitively, the meter operator gathering this information when undertaking metering installation work must be the most efficient means of collecting the data for distributors.</p> <p>This is because:</p> <ul style="list-style-type: none"> • they are already on site to undertake other work; • the complexity of making/recording and keeping an appointment has already been undertaken by an industry party; • the customer impact is reduced as a separate visit to collect the information is not required; • the time taken to record the data will be minimal and could be undertaken as part of the existing risk assessment process; • it is environmentally better as there are fewer vehicles on the road and less vehicle miles travelled.

		<p>Alternatively should distributors collect the data themselves this would mean separate visits and additional customer inconvenience.</p> <p>This would require:</p> <ul style="list-style-type: none"> • specific site visits to record the required information; • making/ recording and keeping of appointments for the sole purpose of collecting service termination data; • more vehicles on the road and a greater number of vehicle miles travelled; • ultimately increased cost to be borne by customers. <p>Note that when we are on site for any other purpose we will collect a significantly more detailed amount of service termination data.</p>
SP Distribution / SP Manweb	Non-confidential	<p>The DNO has two options if this opportunity is not taken.</p> <ul style="list-style-type: none"> • Gather the information themselves over an extended period of time at no additional cost, relying on existing data, which is limited. <p>Independent data collection exercise carried out separately to the Meter operators activities which could depend on scope cost anywhere between £5 & £25 per property.</p>
SSE Metering	Non-confidential	<p>We need to fully understand the methodology for capturing this data on our platforms to realise the full impact of development costs and final benefits. See response to question 4 for additional detail</p>
UK Power Networks	Non-confidential	<p>The benefit of using the meter operator is in synergy as he has to undertake a site visit for the smart roll out. Smart metering rollout presents an unprecedented opportunity to gather this data across a large population of the exit points in an efficient manner and minimises customer disturbance.</p> <p>The MOP personnel are trained and will have to pull fuses to fit meters, hence having access to key</p>

		<p>items of data.</p> <p>There will be costs in developing hand held terminal software but industry changes that impact the IT of a single class of party are quite normal.</p> <p>There should be no additional costs of travelling to site, and the time spent on site should not need to increase materially, if at all.</p> <p>The DNO will incur costs in receiving and processing this data from flows.</p> <p>Meter Operators and Suppliers would benefit from improvements in the quality management of service terminations as they are by far the biggest operator on this asset.</p>
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Company	Confidential/ Anonymous	7. Recognising that the costs of this new requirement will ultimately be passed to customers, please provide your views on how any costs should be funded and how or why you have reached this conclusion?
Anonymous 1	Anonymous	<p>The Meter Operator collecting this data is the lowest cost solution for GB customers. As each property will be visited under the smart meter rollout there is little or no margin cost for collecting this data, as the Meter Operative attending site will need to assess the service termination equipment as part of his/her risk assessment before undertaking his/ her duties.</p> <p>Whereas if a Distributor or an agent acting on its behalf visited each property within its distribution services area to obtain the information, either before, during or after the rollout of smart meters GB customers would face the extra costs for this data collection exercise.</p>
British Gas	Non-confidential	<p>For this proposal to be supported we would need to see body of evidence that there is an overall business case where the benefits of collecting this information outweigh the additional costs.</p> <p>Provided a justifiable business case is put forward, we consider that costs could be funded by requiring Distributors to pay a transaction fee to the Supplier each time the required information is provided. By charging the distributor for this service the distributor would receive a cost signal which</p>

		<p>would facilitate cost efficiency and lead to the minimum cost to consumers.</p> <p>We would also highlight that:</p> <ol style="list-style-type: none"> 1. as is set out in the change proposal, Ofgem included its encouragement for DNOs to build up a more detailed picture of their cut out populations in the RIIO ED1 Strategy Decision in March 2013, and 2. the judgement in the 'RIMISSE' court case at the Technology and Construction High Court was provided in September 2012, 3. DNOs as dutyholders have statutory health and safety obligations relating to their service termination equipment <p>It is therefore clear to us that any funding required to allow DNOs to discharge their legal and statutory duties, taking account of all of the above, should have been included in the RIIO ED1 business plans submitted by DNOs to Ofgem in July 2013 and March 2014 and will therefore be funded by the RIIO ED1 price control. Therefore we consider any funding mechanism that does not require the cost being borne by distributors during RIIO ED1 can be assumed to result in customers funding the costs more than once which would not be acceptable.</p>
E.ON	Non-confidential	<p>We are not clear on what the benefits of DCP 235 are for customers to warrant an increase in costs. Should this become a new requirement we would expect to see a reduction in the cost of system charges, greater than the additional costs of collection</p>
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	<p>We feel it is appropriate that costs should lie where they are incurred. Our reasoning behind this is:</p> <ul style="list-style-type: none"> • it will drive the most efficient solution; • the charges applied to distributors are likely to be marked up by suppliers and there is no incentive on suppliers to minimise these charges, so it is unlikely that distributor costs would be minimised; • suppliers have the ability to negotiate rates with their agents and could incorporate these requirements with other routine changes in order to drive down cost.

		the costs which are ultimately borne by customers must be minimised.
SP Distribution / SP Manweb	Non-confidential	The cost of collecting this one off data exercise should be consistent with existing Data transfer costs. No cost should be passed to the DNO.
SSE Metering	Non-confidential	Ultimately this is the responsibility of the DNO to routinely inspect and record the condition of their assets under the ESQCR's. We believe that there should be a significant contribution from the networks to bridge their gap in knowledge of their equipment.
UK Power Networks	Non-confidential	Costs should be minimal and form part of the smart installation costs between the MOP and the supplier. The supplier has procured the MOP on a competitive basis and so has ensured a cost efficient service. Where the party incurring the costs is responsible for them the motivation to find synergies and opportunities to minimise is significant. E.g. during smart meter registration time. There is no point in the DNO visiting as well the MOP and so duplicating costs and adding to customer disruption.

Company	Confidential/ Anonymous	8. Is the Data Transfer Network (DTN) the best mechanism for communicating this information?
Anonymous 1	Anonymous	No comment.
British Gas	Non-confidential	We agree that the DTN is the best mechanism to communicate this information We have some comments on the proposed data items as follows: Item Name: Service Termination Equipment – Accessibility Item Reference: Jxxxa Item Ownership: MRA Item Description: Is cut-out readily accessible to be

		<p>operated/worked on? Units: None Valid Set: Values are: Y Yes N No</p> <p>Should this be "Service Termination Equipment Accessible"? Also what is the definition of accessible? Would behind a locked door be accessible?</p> <p>Item Name: Service Termination Equipment - Location Environment Item Reference: Jxxxx Item Ownership: MRA Item Description: Is the Service Termination Equipment location subject to dampness or humidity?</p> <p>Units: None Valid Set: Values are: Y Yes N No</p> <p>Data item should be "Service Termination Equipment - Location Environment Dry"</p> <p>Item Name: Service Termination Equipment - Building Type Item Reference: Jxxxxf Item Ownership: MRA Item Description: Is the Service Termination Equipment location within a multi-occupancy building with more than three dwellings?</p> <p>Units: None Valid Set: Values are: Y Yes N No</p>
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		Data item should be "Service Termination Equipment – Multi-occupancy"
E.ON	Non-confidential	Yes. It is already established, in use and is the most secure form of transfer
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	The DTN does offer a robust and industry proven vehicle to deliver the data. However this would require the development of a unique industry flow to be sent from meter operators to the distributors when a smart meter is installed. Once the smart metering rollout is complete the flow should be removed from the DTC.
SP Distribution / SP Manweb	Non-confidential	Yes.
SSE Metering	Non-confidential	We agree that the DTN is the most suitable vehicle to capture this.
UK Power Networks	Non-confidential	Yes. The industry is set up to use the DTN providing a consistency in operation. Any other methods of communication would provide increased costs which would need consideration against quality and efficiency of the captured information.

Company	Confidential/ Anonymous	9. What is the optimal way in which the meter operator could determine that the Distributor already has service termination data for a given site?
Anonymous 1	Anonymous	By informing the Supplier/ Meter Operators in a dataflow that the Distributor holds the service termination data.
British Gas	Non-confidential	We do not see how this requirement can be efficiently discharged. It should be the distributors responsibility to record and store the required information. We do not believe it would be efficient for

		meter operators to have to record when service termination data is required. If the D0215 is to be used to notify meter operators when service termination data is required, how would the distributor know when a meter operator is about to visit a property and therefore when to send the flow?
E.ON	Non-confidential	This is a process issue that would need to be resolved if DCP 235 was recommended
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	<p>The process must be kept simple to achieve maximum effectiveness and there are significant issues associated with collecting data at some sites but not others. The least complex and least confusing arrangement would be for MOP's to collect data from all locations.</p> <p>We feel that the most efficient solution would be for a one off data collection exercise during the smart meter roll-out. This would ensure that all staff are aware of their obligations and the data transfer process could be kept simple.</p> <p>Note – new supplies could be excluded as the DNO will collect this data as part of the installation record.</p>
SP Distribution / SP Manweb	Non-confidential	There is no way that the Meter Operator could pro-actively determine that the Distributor already has the information, the DNO require to "flag" properties where no info is required (example would be where recent modernisation has taken place and information is already captured)
SSE Metering	Non-confidential	As all operatives are working in an environment with mobile technology, some form of flag needs to be available for each site that can be easily recognise by the operative to confirm if this detail is required or not.
UK Power Networks	Non-confidential	<p>If it is routine for the MOP to gather this data then it may add complexity to process if he has to determine whether to or not.</p> <p>A simple approach of gathering it every time would avoid human error in making the assessment of whether to do so or not. This will also enable any unforeseen differences in data over time to be investigated.</p>

Company	Confidential/ Anonymous	10. Are there other ways that this information could be gathered and how do they compare or contrast with the proposed method?
Anonymous 1	Anonymous	See response to question 7. The proposed method is the minimum cost solution for collecting service termination data.
British Gas	Non-confidential	<p>There are alternative means to collect this information that should be costed and compared with other solutions. For example distributors could approach other organisations and agree commercial terms to visit all properties in their area to collect the information on a street by street basis. This may be more economically efficient than relying on the smart meter roll out visits to collect this data. In due course data collectors may be looking for other opportunities for their staff to replace the meter reading activity.</p> <p>An additional benefit of this approach could see the activity completed sooner and if it included, for example, the number of phases, then a percentage of Smart jobs would benefit from knowing the number of phases in advance of the rollout. The exercise should also be used by the DNO to plug the gap in the data they hold to populate the D0215 as currently they do not appear to have all the data for MPANs created pre 6th November 2008.</p>
E.ON	Non-confidential	DNO's should implement their own risk inspection framework. As stipulated in the HSE summary provided to SMDG MISG on the 8 th June 2015 the 'control measures that need to be adopted may be different from one supplier/ DNO/ meter operator to the next and may change with time'. As the duty is always on the duty holder we believe that DNO's should manage their own risk and provide an alternative for collection rather than introducing an additional obligation on suppliers. The current consideration by suppliers to adopt a risk based approach to inspections may also have an impact on solution
Southern Electric Power Distribution plc and Scottish Hydro Electric Power	Non-confidential	<p>Distributors could collect the information themselves but this would be less efficient overall, more costly and more disruptive for customers, as outlined in our response to Q6. There may also be issues regarding cost recovery as the ED1 settlement is agreed.</p> <p>Distributors could contract directly with MOPs to collect the data when on site undertaking meter changes, but this may be unacceptable to suppliers as the 'primary employer'.</p>

Distribution plc		Distributors could contract with other parties but lack of industry and distributor equipment knowledge would introduce the need for additional training requirements. This would also involve specific site visits, but this would also be less efficient overall, more costly and more disruptive for customers.
SP Distribution / SP Manweb	Non-confidential	Yes there are other ways to collect data, but nothing of the scale of the SM engagement. We should take the opportunity presented by the customer engagement, to capture as much info as possible to the benefit of all parties (and least cost to the customer).
SSE Metering	Non-confidential	We do not believe there is a more economical method than the DTN.
UK Power Networks	Non-confidential	The MOP collecting the data offers a synergy that is not available from any other method of collecting it. This is the only method which would avoid the need for an additional visit to customer premises, the associated extra costs and further disruption / inconvenience for the customer.

Company	Confidential/ Anonymous	11. Please provide your views on the suggestion to remove Category C items from industry processes and how those items given in the Attachment which are identified as not having a map across to the service termination equipment in the proposed Data Flow should be addressed?
Anonymous 1	Anonymous	----- prefers not to remove Category C information from industry processes as it provides a greater level of granularity.
British Gas	Non-confidential	We do not believe that you could remove all Category C items for industry processes. For example there are specific C codes in the MOCOPA Guidance for Service Termination Issue Reporting document that are not asked for but the DNO would still require the information; i.e. "seal tags broken on cut-out" and "fed from Distribution board – local or remote meters".
E.ON	Non-confidential	We consider category C items should continue to be reported via D0135 meaning no changes are

		necessary
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	<p>Whilst there could be a case for removing all Category C issues from the existing reporting process this should only be considered if the provision of asset condition information as proposed in DCP235 is approved.</p> <p>We agree with the assessment relating to information that will be provided should DCP235 be agreed in its current form. Our view on the remaining items is as follows:</p> <p>C02 – we would like to see a means for distributors to continue to receive this information.</p> <p>C07 - we would like to see a means for distributors to continue to receive this information.</p> <p>C11 – we agree with the assessment that distributors could derive this information from other items; we are in agreement with not receiving this data.</p> <p>C16 – we are in agreement with not receiving this data</p> <p>The non C code items listed, i.e. those associated with shared fuses and neutrals are more useful to suppliers/ MOP's. Having this data may enable them to manage any associated issues in a more efficient way. Where this information may be useful to distributors is where it is used to support the development of future asset replacement programmes. It may be useful in circumstances where there are shared fuses and neutrals to retain this information elsewhere in MDD, this way it would be available to all industry parties.</p> <p>Options for providing this information are:</p> <ul style="list-style-type: none"> retain existing C code reporting but a much slimmer list – there are advantages in this as changes required will be minimal and relate to MRA governance only; <p>develop a means to incorporate the items required within the DCP235 reporting process and remove them from existing governance. This would require both MRA and DCUSA changes.</p>
SP Distribution / SP Manweb	Non-confidential	<p>There should only be a single transfer of Asset data between the parties in this area.</p> <p>The existing CAT C items are of lesser importance to a DNO understanding the basic construction</p>

		<p>and equipment type, and therefore the associated risk of the service position asset.</p> <p>The removal of the Category C issue has a longer term impact than the one off data collection exercise proposed. Formalised Service position Issue reporting should remain intact as an industry tool once the SM exercise is complete.</p>
SSE Metering	Non-confidential	<p>As per question 5 we don't agree that these changes go far enough to capture all the relevant scenarios where an intervention is required by the DNO. We would prefer that an all encompassing solution was introduced before the Category C items were removed from reports. These all create a disjointed journey for the customer where non reporting can only result in no resolution taking place.</p>
UK Power Networks	Non-confidential	<p>This is an acceptable approach and a new field for reporting C02, C07, C11 and C16 could be added to the new flow.</p>

Company	Confidential/ Anonymous	<p>12. Which DCUSA General Objectives does the CP better facilitate? Please provide supporting comments.</p> <ol style="list-style-type: none"> 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.
Anonymous 1	Anonymous	<p>The CP better facilitates DCUSA General Objectives 1 and 3. As previously stated ----- ----- believes that the data collection carried out under the smart meter rollout is the minimum</p>

		cost solution for GB customers.
British Gas	Non-confidential	DCUSA objectives 1 and 3 could only be better facilitated if it can be shown that there is a positive business case for the proposal. Currently we have only been able to identify costs for this proposal without any corresponding tangible benefits
E.ON	Non-confidential	We do not agree that that DCP 235 better facilitates DCUSA objectives. Objective 1 has been proposed but until we have fully understood costs and benefits we cannot support this.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	We agree with the assessment of the Working Group that General Objective 1 is better facilitated, for the reasoning set out in the consultation document.
SP Distribution / SP Manweb	Non-confidential	<p>1: This CP is the simplest method of collaboration between parties ensuring the service position equipment is in the best operational condition possible.</p> <p>We believe that this CP facilitates the following General Objectives:</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 – we believe that this additional information may allow pro-active remedial work to be scheduled to mitigate any impacts to the Distribution system, utilising existing information in order to ensure that this is economical</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 – We believe that DNO parties are able to discharge elements of their obligations by the utilisation of existing information</p>
SSE Metering	Non-confidential	<p>We believe that this meets:</p> <ul style="list-style-type: none"> 1, We believe this is the second most relevant objective, as the DNO is finding an efficient method of discharging their responsibilities (going to visit the properties separate to

		<p>Suppliers would arguably be inefficient)</p> <ul style="list-style-type: none"> • 3, We believe this is the key beneficiary of the proposal <p>With regard to :</p> <ul style="list-style-type: none"> • 2, We are neutral on this point. • 4, is questionable until we have fully considered the cost of development to meet these requirements. <p>5, We are neutral on this point</p>
UK Power Networks	Non-confidential	Objective 1 – the MOP obtaining service termination data presents a cost effective way of capturing data that will enable the distributor to develop and maintain the system in an efficient and economical way.

Company	Confidential/ Anonymous	<p>13. Which DCUSA Charging Objectives does the CP better facilitate? Please provide supporting comments.</p> <ol style="list-style-type: none"> 1. that compliance by each DNO Party with the Charging Methodologies facilitates the discharge by the DNO Party of the obligations imposed on it under the Act and by its Distribution Licence. 2. that compliance by each DNO Party with the Charging Methodologies facilitates competition in the generation and supply of electricity and will not restrict, distort, or prevent competition in the transmission or distribution of electricity or in participation in the operation of an Interconnector (as defined in the Distribution Licences). 3. that compliance by each DNO Party with the Charging Methodologies results in charges which, so far as is reasonably practicable after taking account of implementation costs, reflect the costs incurred, or reasonably expected to be incurred, by the DNO Party in its Distribution Business. 4. that, so far as is consistent with Clauses 3.2.1 to 3.2.3, the Charging Methodologies, so far as is reasonably practicable, properly take account of
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		<p>developments in each DNO Party's Distribution Business.</p> <p>5. that compliance by each DNO Party with the Charging Methodologies facilitates 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.</p>
Anonymous 1	Anonymous	No comment.
British Gas	Non-confidential	N/A
E.ON	Non-confidential	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	None are applicable.
SP Distribution / SP Manweb	Non-confidential	SPEN does not believe that the CP would have any impact on charging objectives
SSE Metering	Non-confidential	
UK Power Networks	Non-confidential	There should be no charging impact.
Company	Confidential/ Anonymous	14. Please provide details of any wider industry developments that may impact upon or be impacted by this CP

Anonymous 1	Anonymous	The consultation for this CP covers the known wider industry developments.
British Gas	Non-confidential	<p>We do not see any impacts on wider industry developments. The supplier's obligation to inspect their meters is separate to the distributors obligation to maintain an accurate record of their assets. In the 'RIMISSE' court case at the Technology and Construction High Court (September 2012) the judge stated</p> <p>....."the distributor can not and should not rely upon the supplier to do the job which the distributor is statutorily required to discharge. Thus, the duty to maintain cut-out assemblies is not discharged by hoping or expecting that the supplier, say through its meter readers or otherwise, will do the requisite maintenance or inspections."</p> <p>We believe that this proposal is separate to work ongoing to review enduring meter inspection obligations as that baseline obligation and the British Gas derogation is based upon current industry arrangements and data.</p>
E.ON	Non-confidential	The national smart meter roll out
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	The ability to amend or remove the 'must inspect' supply licence obligation (SLC12.14) could be impacted by distributors not having access to the data this CP proposes.
SP Distribution / SP Manweb	Non-confidential	Any opportunity to improve safety at the service position should be taken. We note however that the DECC 'Must Inspect' sub group may have an impact on this CP, the extent of this is not known at this time
SSE Metering	Non-confidential	<p>We believe they have all been referenced.</p> <p>We would be interested to understand the view from HSE on DNOs legally discharging their</p>

		obligation in the event that a MOP inadvertently reported the condition of an asset incorrectly that was later found to be unsafe?
UK Power Networks	Non-confidential	Notwithstanding the SLC12 review the MOP has a continuing obligation under reg 3 of ESQCR to ensure their equipment is maintained and so to do so must visit the premises routinely to discharge that obligation. In doing so he will be able to report any visible defects with the distributor's equipment.

Company	Confidential/ Anonymous	15. Do you have a preference on the date that DCP 235 is implemented into the DCUSA?
Anonymous 1	Anonymous	As soon as practicable, but no later than April 2016.
British Gas	Non-confidential	As stated previously we would be unable to implement this change before November 2016 at the earliest.
E.ON	Non-confidential	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	The proposed date is reasonable as it gives time for system development and aims to be in place before the DCC "goes live" and hence mass roll-out of smart meters commences. However it needs to be recognised that the implementation date will need to change if it is not possible to reach a decision before the end of 2015.
SP Distribution / SP Manweb	Non-confidential	In line with SM roll out.
SSE Metering	Non-confidential	We would require 10 months to design, implement, test, train and roll out the changes required

		under this change proposal.
UK Power Networks	Non-confidential	As soon as practicable.

Company	Confidential/ Anonymous	16. Are there any alternative solutions or matters that should be considered by the Working Group?
Anonymous 1	Anonymous	No comment.
British Gas	Non-confidential	The proposal has not considered what level of liability would be incurred by the meter operator should the information provided be inaccurate or incomplete. How does the distributor intend to rely on the information? Depending on the answer to this question would impact on the training requirements and subsequent additional cost to the supplier and subsequent charge to the DNO
E.ON	Non-confidential	It is not for a supplier to comment on how a DNO meets its own obligations
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Please refer to question 9. The process must be simplified to avoid confusion between all industry parties. A 'one-off' data collection exercise whilst a smart meter is being installed would provide the most cost efficient and least disruptive solution to customers and industry parties.
SP Distribution / SP Manweb	Non-confidential	We would suggest as an enhancement to Category C that Data transfers include the asset info required under CP 235.
SSE Metering	Non-confidential	Please see our response to question 5
UK Power Networks	Non-confidential	No