DCUSA DCP 204 Consultation responses – collated comments

Company	Confidential / Anonymous	1. Do you understand the intent of the CP?	Working Group Response
British Gas	Non-confidential	Yes	Noted
BUUK (representing the Electricity Network Company Ltd and Independent Power Networks Ltd	Non-confidential	Yes	Noted
EDF Energy	Non-confidential	EDF Energy understands the intent of the CP.	Noted
Electricity North West	Non-confidential	Yes, it is to cater for the introduction of smart metering technology and the impact that this will have when considering demand control.	Noted
Northern Powergrid	Non-confidential	Yes	Noted

RWE npower	Non-confidential	Yes, we understand the intent is to amend the existing Schedule 8 arrangements for Distributors to provide for indirect influence over load switching to preserve security of supply and the integrity of the network. The inclusion of randomised offset obligations aims to minimise the coincidence of load switching for the same purpose.	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Yes.	Noted
SP Distribution plc / SP Manweb plc	Non-confidential	Yes	Noted
SSE	Non-confidential	SSE understands the intent of the CP.	Noted
UK Power Networks	Non-confidential	Yes	Noted
Western Power	Non-confid	Yes.	Noted

Distribution	ential		

Company	Confidential/ Anonymous	2. Are you supportive of the principles established by this proposal?	Working Group Response
British Gas	Non-confidential	Whilst we understand that it may be more efficient in some areas of the country to limit load rather that re-enforce the network we do not believe a proper cost benefit has been carried out to establish whether the proposed changes to DCUSA are proportionate to the risk. The current Radio Teleswitch metering technology was developed in the 1980s and we have a concern that any suggestion to try and replicate this as stated in para 2.4 of the consultation is unnecessary and disproportionate to the risk.	The Working Group acknowledged that it is not a like for like replacement and seeks to replicate the method through smart metering.
BUUK (representing the Electricity Network Company Ltd and Independent Power Network	Non-confidential	Yes	Noted

s Ltd			
EDF Energy	Non-confidential	EDF Energy is broadly supportive of the principles established by this proposal. We believe that Schedule 8 needs to be updated as a consequence of the roll-out of smart metering, and that the current notices need to be clarified. We do however have specific concerns regarding certain aspects of the proposal, and specifically the proposals regarding the mandation of randomisation for all smart meters.	Noted
Electricity North West	Non-confidential	Yes, it is a necessity that this schedule is amended to cater for the introduction of smart metering and the impact this will have regarding the removal of dynamic tele-switch arrangements and over time the non use of Standard Settlement Classes which won't exist in the half-hourly settlement world.	Noted
Northern Powergrid	Non-confidential	Yes	Noted
RWE npower	Non-confidential	Yes, we appreciate that with the roll out of smart metering, existing switching devices will no longer operate and the industry needs to ensure that a mechanism exists by which security of supply and integrity of distribution networks are preserved.	Noted
Southern	Non-confident	Yes.	Noted

Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	ial		
SP Distribution plc / SP Manweb plc	Non-confidential	Yes	Noted
SSE	Non-confidential	SSE broadly supports the proposal.	Noted
UK Power Networks	Non-confidential	Yes	Noted
Western Power Distribution	Non-confidential	WPD is supportive of the principles but has reservations about some of the detail.	Noted

Company	**Confidential/**	**3. Are there any unintended consequences of this proposal?**	**Working Group Response**

	Anonymous		
British Gas	Non-confidential	Some of the proposed obligations on suppliers to place restrictions on use of particular switching times may have an impact on our acquisition process and in-field metering operations. This may be the case if suppliers are required to understand what switching times are in operation at a particular customers property before they attend.	The Working Group noted that Suppliers will seek to replicate the existing set up based on the information available to them (i.e. which switching regime they are on). It was noted that there is a risk that the Supplier may not have accurate information but this is a wider industry issue and data cleansing is being discussed in other industry forums.
BUUK (representing the Electricity Network Company Ltd and Independent Power Networks Ltd	Non-confidential	Further work may be required to develop arrangements for embedded networks. Whilst few embedded networks will have RTS controlled metering points, there needs to be some work to ensure that demand management on IDNO/DNO networks is integrated in some way. It is recognised that this may be out of scope of this CP	Noted
EDF Energy	Non-confidential	EDF Energy believe that there could be unintended consequences of this proposal in that this could lead to costs being reallocated from DNOs to Suppliers if Load Managed Areas are not managed effectively. Changes to a customer's load switching times or even the randomisation settings within their meter as a consequence of issues with coincidence of demand will require effective customer communication to ensure	Noted

		customers fully understand the precise timings for any "off peak" periods and when they should switch appliances on or off. Misunderstanding may result in customer confusion and higher than expected bills that could impact the smart metering roll-out. The costs incurred as a result may exceed those that might otherwise have been incurred to reinforce the network in order to avoid capacity issues. It is important that it is determined where money might be most effectively spent, and not assume that avoiding reinforcement of the network is the preferable option.	
Electricity North West	Non-confidential	None that we have yet identified.	Noted
Northern Powergrid	Non-confidential	None that we have identified.	Noted
RWE npower	Non-confidential	The introduction of new terms 'Load Switching' and 'Load Switching Regime' will require consideration in the context of the Balancing and Settlement Code.	Noted
Southern Electric Power Distribution plc and	Non-confidential	None that we are aware of.	Noted

Scottish Hydro Electric Power Distribution plc			
SP Distribution plc / SP Manweb plc	Non-confidential	No	Noted
SSE	Non-confidential	Yes. There is dependence that the current Smart offerings do not have the capability to meet some of the items detailed in the Consultation. A case in point is SMETS1 meters are considered as 'Smart' but do not have Randomisation as part of the specification so cannot offer this functionality. There is a need to reflect these capabilities as only being available post SMETS2 and is linked to the DCC ILO phase of the SMiP, so logically should only come into force from that time onwards.	The group noted that the CP will not apply to SMETS1 meters as they will not have the appropriate capabilities.
UK Power Networks	Non-confidential	This proposal seeks to change current processes in order to make the required changes for Smart Meter functionality to be used, but in doing so is changing the terminology and processes that relate to existing meters. Care needs to be taken to ensure that the proposed changes do not impact on the processes for dumb meters, prior to being changed as part of the Smart Meter roll out, which could result in Parties needing to make changes to systems and processes and incur costs relating to dumb meters.	The group agreed that consideration needs to be given to the definition of Load Switching Regime during the legal review. **Action**

Western Power Distribution	Non-confidential	Please see answers to later questions.	

Company	Confidential/ Anonymous	4. Do you consider that the proposal better facilitates the DCUSA general objectives? Please provide your rationale.	Working Group Response
British Gas	Non-confidential	The proposed supplier obligations appear to apply to all Smart Metering Systems which we do not believe is proportionate and as currently drafted would not better facilitate the applicable objectives. We believe any supplier obligations should only apply to SMETS 2 meters.	The group noted that they agreed with this suggestion and would capture this within the legal text. **ACTION**
BUUK (representing the Electricity Network Company Ltd and Independent Power Networks Ltd	Non-confidential	Yes	Noted

EDF Energy	Non-confidential	EDF Energy agrees with the working group's assessment that the proposal better facilitates DCUSA General Objective One. However this will only be the case if the costs associated with the process overall are effectively managed and not just transferred from DNOs to Suppliers.	Noted
Electricity North West	Non-confidential	Yes. **General objective 1** Without this change proposal, the roll out of smart metering will remove dynamic tele-switching which provides an element of demand control resulting in less efficient and economical networks. It also protects the existing arrangements whereby the switching of demand is spread over a period of minutes due to the nature of the existing equipment installed by the use of (and the rules associated with) a Randomised offset limit. Without this, the more accurate electronic meters would result in all the load for a Specific Load Switching Regime being triggered at the same time. This may result in network re-enforcement. This would make the network less efficient. **General objective 4** This change also considers standardising terms by the introduction of Load Switching Regimes to replace Standard Settlement Class (which within it contains the time pattern regimes) that over time will not be used when the market is fully settled in a half-hourly way. This therefore future proofs the change and as such promotes efficiency in the administration and	Noted

		implementation of the DCUSA Agreement. The rest of the DCUSA General Objectives are not impacted by this change proposal so the effect is neutral.	
Northern Powergrid	Non-confidential	We agree with the working group that general objective 1 is better facilitated by DCP 204 as it seeks to amend Schedule 8 on demand control to reflect development of smarter networks.	Noted
RWE npower	Non-confidential	The DCP is relevant for: *3.1.1 the development, maintenance and operation by each of the DNO Parties and IDNO Parties of an efficient, co-ordinated, and economical Distribution System;* Demand control is important for network integrity which supports the operation of an efficient distribution system.	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Yes. We believe that this Change Proposal better facilitates DCUSA General Objective 1, as the ability to manage load switching is an essential tool for distributors to have available as a potential means of avoiding or deferring network reinforcement.	Noted

SP Distribution plc / SP Manweb plc	Non-confidential	We agree with the Working Group's assessment that General Objective One is better facilitated by DCP 204.	Noted
SSE	Non-confidential	The proposal better facilitates the general objectives although it does read that the obligations upon the DNOs are just to notify the Supplier community to minimise the impact of Load situations to themselves. There is little onus upon the DNO to justify and identify corrective measures. There needs to be transparency on how the DNO will resolve these issues. Where an LMA is considered to be the most financially appropriate solution then there needs to be agreement between DNOs, Suppliers and Ofgem as to how customer communications are managed. There needs to be a balance between ensuring continuity of supply and protecting the network and allowing consumer choice in relation to tariff options. This Consultation seems to lean heavily towards a requirement on the DNO to utilise LMAs as a first resort as a means to protect the supply and reducing the costs. However, there is a need for the DNO to ascertain the reasons for the load increase and to explain what actions it will take to minimise unnecessary constraints on the end customers' use of their electricity supply.	The Working Group noted that there is a need for DNOs and Suppliers to work together to manage customer communications if there is a requirement for an LMA.
UK Power Networks	Non-confidential	We believe that this change better facilitates General Objective 1 by providing for improved functionality following Smart Meter roll out but may have a detrimental effect on the existing processes to be used on an ongoing basis until such time as all existing	Noted

		meters have been replaced by Smart Meters.	
Western Power Distribution	Non-confidential	Yes. However, whilst the proposal better facilitates the development, maintenance and operation of an efficient, co-ordinated, and economical distribution system	Noted

Company	**Confidential/ Anonymous**	**5. This proposal requires that randomised offset rules are applied to all smart metering systems. Do you agree with this proposal? If not, please provide your rationale.**	**Working Group Response**
British Gas	Non-confidential	No we do not agree with this proposal, this requirement should only apply to SMETS 2 meters. SMETS 2 caters for this already with a requirement for randomised offset in the range of 0 to 1799 seconds. The offset applies to tariff switching times and Auxiliary Load Control Switch switching times. We do not believe we also need this requirement in the DCUSA as we would have duplication of governance.	The group noted that it has agreed that the proposal should only apply to SMETS 2 meters whilst reviewing an earlier question.
BUUK (representing the Electricity Network Company Ltd and Indepen	Non-confidential	We understand the need for randomised offset rules in some situations and in general agree with the proposal. However, we remain to be convinced that the requirement should be mandated in all circumstances	Noted

dent Power Networks Ltd			
EDF Energy	Non-confidential	EDF Energy does not agree that randomisation should be applied to all smart metering systems. Randomisation moves customers away from their nominal switching times, not only in regards any load that is controlled by the meter but also for any tariff switching times where they are on a multi-rate tariff. This is then a poor customer experience as it creates uncertainty for customers about when their meters will switch between rates. While we recognise that some level of randomisation may be required we do not see any clear justification currently for this being applied to meters outside of Load Managed Areas, and certainly not across all smart meters. This may change in the future where Consumer Access Devices (CADs) enable customers to switch their own load in reaction to price changes but this is not required in the short term. While the application of randomisation helps to limit the coincidence of demand on the network it is fundamentally a poor customer experience, and the application of randomisation needs to be limited to when it is required to protect the security of the supply on both the network, and the National Grid as a whole. We understand that randomisation in regards to the security of the National Grid is currently being considered by the Transitional Security Expert Group (TSEG) and the outcomes of this discussion should be accounted for when considering randomisation	The group discussed this comment and noted that all load is already randomised in the sense that you do not know what the clock settings are. The group agreed that the CP should set out the driver for applying the CP to all meters, if that route is chosen.

		parameters as part of this CP.	
Electricity North West	Non-confidential	Yes, it will avoid load associated with specific Load Switching Regimes being connected at the same time. Currently with existing technology connection drift occurs.	Noted
Northern Powergrid	Non-confidential	Yes	Noted
RWE npower	Non-confidential	Yes.	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	We agree with this proposal.	Noted
SP Distribution plc / SP	Non-confidential	Yes	Noted

Manweb plc			
SSE	Non-confidential	SSE agrees with this proposal.	Noted
UK Power Networks	Non-confidential	Yes. We expect the Supplier to take all measures in both its choice of metering systems and in the wording of its contracts with its customers to ensure that no restrictions upon Randomisation occur. This is vitally important for both distribution network operator and for the national electricity transmission system operator in avoiding step changes in consumption that increase system instability risk due to lack of Randomisation. We strongly recommend that Randomisation is mandatory.	Noted
Western Power Distribution	Non-confidential	Yes.	Noted

Company	**Confidential/ Anonymous**	**6. Which is the most appropriate Industry Code for the rules associated with randomised offset to be governed under?**	**Working Group Response**
British Gas	Non-confident	We believe the logical place for this to sit would be the Smart Energy Code. SMETS 2 meters will be deployed	The Group agree that the most appropriate Industry Code is SEC, but it is possible to be under DCUSA as

	ial	from start of 2016 which should give adequate time for these rules to be incorporated	well. The Group propose to continue the change with SEC in mind and propose that it should be implemented into SEC. The Group agreed that a paper must be drafted to argue the reasons why it should be in SEC.
BUUK (representing the Electricity Network Company Ltd and Independent Power Networks Ltd	Non-confidential	This does not appear to a settlement or registration issue. Therefore it appears to be out of scope of the MRA and the BSC. Given that the driver to manage this is about managing the distribution system efficiently and economically. DCUSA has a role to play in defining obligations of respective parties and because it manages the relationship between supplier and supplier. However, technical specifications for randomisation may be better covered through an engineering recommendation developed pursuant to the Distribution Code. Consequential changes may/would be required to the BSC and other relevant industry codes to ensure compliance with relevant standards.	Noted
EDF Energy	Non-confidential	EDF Energy believes that the DCUSA is the most appropriate Industry Code under which to manage the rules relating randomisation. The reason for applying randomisation is for the purposes of demand management and security of supply, which would only seem to fall within the remit of the DCUSA. The impact of randomisation on settlements will need to be accounted for under the BSC but the arrangements for applying randomisation would not seem to fall within the remit of that code, this would also not seem to fall within the remit of the Smart Energy Code even though it specifically applies to Smart Meters.	Noted

Electricity North West	Non-confidential	The requirement for a SMETS 2 meter to include the functionality to be able to apply randomised offset needs to be with the DCC in the SMETS specification. The setting of the value to be applied should be within DCUSA, since the value chosen will impact the use of the network.	Noted
Northern Powergrid	Non-confidential	We believe the BSC is the most appropriate code for the governance of the rules for randomised offset limit. This assumes that the ultimate scope of the Smart Energy Code in relation to the commissioning of smart metering systems is limited to communications and security aspects and does not include for time-switching or metering for time of use. It also assumes that the key purpose of the randomised offset functionality is to manage the adverse implications on the transmission system arising from synchronised switching of distribution connected load. If further consideration identifies that the key purpose of the randomised offset is to manage the adverse implications on the distribution system arising from synchronised switching, then perhaps randomised offset would best be managed by DCUSA.	Noted
RWE npower	Non-confidential	Although the randomised offset rules are only applicable to smart meters, the DCUSA is an appropriate place for this to be governed as it is a supplier/distributor matter. Any links to the Smart Energy Code need to be considered and definitions must be consistent.	Noted
Southern Electric	Non-confidential	In our view, DCUSA is the most appropriate code for the randomised offset rules to be governed under, as randomised offset is a key element of enabling and	Noted

Power Distribution plc and Scottish Hydro Electric Power Distribution plc		delivering the Demand Control provisions of DCUSA and the appropriate parties can readily participate in the governance processes.	
SP Distribution plc / SP Manweb plc	Non-confidential	We believe that DCUSA is the most appropriate body for the rules associated with randomised offset. The reason for this view is that under DCUSA both the DNOs and Suppliers can come to an agreement with regard to the actual switching process and times and once agreement has been reached then the Supplier can advise the DCC accordingly of the relevant switching times.	Noted
SSE	Non-confidential	The only Industry mechanism governing Smart Metering Obligations comes under the SEC. This does not cover all impacted parties identified in the Consultation so this may require separate administration under Ofgem as they are ultimately responsible for the ongoing control of the Roll Out and are the central body looking at protecting consumer interests. Ofgem provides the capability to co-ordinate the actions of the GDNs, DNOs and Suppliers to benefit the customer. The SEC could include the governance of the randomisation requirements and all items identified as issues within this consultation. DCUSA can continue to provide the operational governance.	Noted
UK Power Network	Non-confidential	Randomisation could be governed under DCUSA, BSC or SEC.	Noted

s		We consider that the risks arising from lack of Randomisation or insufficiently broad Randomisation of customer switched demand behaviour could lead to a direct impact upon both the distribution network operation and the national electricity transmission system operation and accordingly should be governed firstly under the BSC and secondly under the DCUSA. We consider that any requirements set out in the SEC are limited to Smart Metering but the need to randomisation of switched demand regimes may extend above Smart Metering into Advanced Meter Reading not covered by the SEC. We feel that SEC should therefore reference BSC and DCUSA requirements.	
Western Power Distribution	Non-confidential	WPD believes that DCUSA is the most appropriate Industry Code as this governs the relationship between Network Operators and Suppliers.	Noted

Company	**Confidential/ Anonymous**	**7. What are your views regarding the value (in seconds) that should be defined in DCUSA as the minimum randomised offset limit?**	**Working Group Response**
British Gas	Non-confidential	Existing teleswitched meters have a randomised offset of +/- 3 ½ minutes. The proposal to increase the offset does not appear to be justified and could cause customer complaints and have potential settlement impacts. We see no justification from moving from the current arrangements.	The Group agreed to keep the value as 600 seconds, if it becomes evident that this is not correct then it can be reviewed at a later date when necessary as it is easily adjustable.

BUUK (representing the Electricity Network Company Ltd and Independent Power Networks Ltd	Non-confidential	No view expressed	
EDF Energy	Non-confidential	Noting our answer to question 5 above, where it is determined that randomisation does need to be applied to protect the security of the network and/or the National Grid, then a minimum value of 600 seconds for the Randomised Offset Limit would seem appropriate.	Noted
Electricity North West	Non-confidential	We are comfortable that the initial setting of 600 seconds (10 mins) is close to what currently happens now (RTS being plus or minus 3.5 minutes) and should be the approach we take. However it is difficult to understand the impact that clock timeswitches are having (and the number that are still out there) since these are rarely re-set after power cuts so a more conservative approach may be considered by setting the value at 900 seconds (15mins)	Noted
Northern	Non-confident	We agree with the recommendation in Attachment 5 of the Consultation Pack i.e. that nominal switching times	Noted

Powergrid	ial	should be set at xx:00 and xx:30 with a Randomised Offset Limit in the range 600 seconds to 1799 seconds. The minimal value of the randomised offset limit should therefore be 600seconds.	
RWE npower	Non-confidential	We agree with the proposal for a minimum of 600 seconds. In practice, this means that every smart meter will be randomly switched between 0 and 10 minutes as a minimum and 0 and 30 minutes as a maximum. The impact that this has on settlement accuracy will need to be considered by any work done under the Balancing and Settlement Code.	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	As detailed in the ENA paper, we do not feel that it is sufficient to simply specify a value (in seconds) that must be applied as a randomised offset. It is important that the randomisation applied does not exceed the interval between the defined switching times and the legal text should be drafted to prevent the risk of this occurring. Assuming that the defined switching times applied remain at xx:00 and xx:30, the minimum period of randomisation should be 600 seconds (10 minutes). At this stage it is difficult to understand the optimum value but it must not exceed 1,799 seconds to keep within a 30 minute period. Flexibility is required to ensure that the value chosen is optimum, but it should be recognised that the value may need to be changed when more experience of operational smart metering has been obtained. Whilst the randomisation period for RTS controlled load is understood, the diversity provided by other switching devices (time clocks, programmable meters) is	Noted

		unknown. Therefore, until a significant volume of such equipment has been replaced by smart metering, it is unlikely that the optimal randomisation period will be understood. In our view, the initial value of randomised offset should be 900 seconds (15 minutes). This provides a margin above the existing RTS devices that should be adequate to cope with the unknown diversity currently provided by other switching devices. It is important to remember that any future change would require significant customer engagement by suppliers and finding a value that works from day one must be a preferred solution.	
SP Distribution plc / SP Manweb plc	Non-confidential	We do not believe it is appropriate to set a minimum level at present, we believe the offset limit should be set at 1799 sec to begin with and as the industry embraces the smart meter roll out, then and only then, when the impact of its usage has been identified should consideration be given to having a minimum randomised offset limit.	Noted
SSE	Non-confidential	SSE agrees with the proposed 600 seconds as a value.	Noted
UK Power Networks	Non-confidential	The values should be set in such a way that no existing customer contracts or existing industry processes need to be changed solely	Noted
Western Power	Non-confident	The current radio tele-switching arrangements provide for a 7 minute (420 seconds) diversity of switching	Noted

Distribution	ial	times. The transition to smart meters should not result in a reduction in the diversity of switching times and consequently the randomised offset limit should be not less than 420 seconds.	

Company	**Confidential/ Anonymous**	**8. Do you think there may be more Load Managed Areas in the future, potentially due to the increased connection of low carbon technologies? Are the proposed changes to the legal text sufficient to manage any associated issues that may arise?**	**Working Group Response**
British Gas	Non-confidential	I think this is more a question for the DNOs however we have a concern that the change of definition of "Capacity Headroom" to a more ambiguous "minimum margin" may place increased restrictions on suppliers to offer tariffs in order to avoid network re-inforcement.	The Group believe that there may be more LMAs in the future to which the majority of the responses agreed.
BUUK (representing the Electricity Network Company Ltd and Independent Power Networks Ltd	Non-confidential	Yes, smart grids will have demand side management as a key component.	Noted

EDF Energy	Non-confidential	EDF Energy believes that it is likely that there will be more Load Managed Areas in the future, however exactly where and when those are likely to occur is not certain. It is therefore important to ensure that the processes put in place are robust and minimise the negative impacts to customers. We believe that the proposed changes to the legal text are sufficient to manage the issues that are likely to arise within the smart metering roll-out period, but that it is likely that this area will need to be revisited in the future in light of the outcomes of Workstream Six of the Smart Grid Forum.	Noted
Electricity North West	Non-confidential	This depends on a number of factors including but not limited to supplier time of use tariffs, electric vehicles charging tariffs, the number of customers within a specific localised area and the impact they have on the network supporting them. The legal text is broad enough to cater for this as and when they occur.	Noted
Northern Powergrid	Non-confidential	Yes, however the proposed changes to Schedule 8 may not be sufficient to manage all the potential issues that may arise. As we understand it the competitive supply market in smart may facilitate the freedom for suppliers to offer innovative time of use tariffs of their choosing i.e. to reflect their commercial positions in relation power purchase opportunities. It may be possible that such time of use tariffs incentivise usage/load movement at local system peak and thereby risk creating new Load Managed Areas. An additional measure could be that the implementation of any new time of use tariffs by suppliers should be subject to DNO approval in relation to demands on its	Noted

		network. We realise that some suppliers may view this as potentially restrictive, but it could reduce the risks of creating new Load Managed Areas and ultimately minimise reinforcement for peak demand and therefore minimise costs to customers in general. As a principle it would seem better to avoid the creation of new Load Managed Areas, rather than for them to be created unintentionally then to implement the permitted management arrangements.	
RWE npower	Non-confidential	It is possible there will be more Load Managed Areas in future. The industry is undergoing a period of unprecedented change, the results of which cannot all be predicted, so it is difficult to comment on whether the text is 'future-proof'.	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	We believe that there are likely to be more Load Managed Areas in future, although it is not currently clear how these might develop. With the development of smart grids and the avoidance of network investment (reinforcement) will be supported by management of network loads, both locally and wider. Workstream 6 is already looking at future options to introduce Demand Side Management techniques as a typical means of matching demand to network capacity. It is also likely that in future it will be necessary to have Generation Managed Areas as well as Load Managed Areas, but this is beyond the scope of this Change Proposal. We believe that the current legal text is appropriate for the extent of this Change Proposal, but also recognise that future changes to DCUSA may well be necessary as the concept of smart grids becomes better developed	Noted

		and potentially requires changes to market arrangements and associated governance.	
SP Distribution plc / SP Manweb plc	Non-confidential	We do not believe there will an increase in Load Managed Areas in the future, given that the industry is now more than ever aware that customers want a secure reliable electricity network and are unlikely to accept the need to manage their load unless they are compensated accordingly.	Noted
SSE	Non-confidential	SSE does believe that there could be more LMAs in the future, although these should, preferably, only be for a short period of time, as the necessary reinforcement action is undertaken. There will always be instances where unforeseen network issues will arise and remain in place for longer to reduce costs that could be passed through to the customer. The Legal Text implies any instance of LMA, new or existing, will be resolved by the issuance of a SRN with little onus upon the DNO to reinforce the network. There does not seem to be any obligation on the DNO to carry out any investigative works on what has created a new LMA instance to occur and to bring forward any short term and longer term resolutions to mitigate any SRN to a Supplier. An example could be where customers, in a focused geographical area, install additional load at a similar time, e.g. EVs, such that it creates unprecedented demand on the local network. The issuance of a SRN will not directly rectify this and there is no obligation upon the DNO to investigate the additional load and to take remedial action in a timely manner in the consumers' best interests.	Noted

UK Power Networks	Non-confidential	The potential need for more Load Managed Areas will be dependent on a number of factors including increases in 'smart' switching of demand, increases in generation and reductions due to energy efficiency, customer awareness, expected efficiencies from smart meters, the move to electrified heat and transport sectors and the regulatory preference for more efficient investment (i.e. avoided reinforcement). Conceptually any technology leading to a more correlated coincidence of demand switching behaviour might lead to a need for a managed area whether that be for demand technologies or generation technologies, particularly where those correlations are observed amongst higher capacity electrical devices such as electric vehicles and heat pumps. All of these factors and the location of new demand will impact on whether more Load Managed Areas are required or the location of new generation may impact on whether Generation Managed Areas might be required. This question does not cover the potential for Load Managed Areas to be enlarged or combined or likewise for Generation of electricity.	Noted
Western Power Distribution	Non-confidential	This is difficult to predict. WPD would prefer any demand side response to be agreed bilaterally between it and the specific customers in question. Demand control through the use of Load Managed Areas is determined unilaterally and affects many customers, and consequently WPD would wish to be consulted. There is also the potential for Schedule 8 to be interpreted such that a company only ever requires one per licence area i.e. it just adds or removes post codes & times of day to the single LMA as and when required.	Noted

Company	Confidential/ Anonymous	9. Would you see value in creating a central register of Load Managed Areas e.g. on the DCUSA website?	Working Group Response
British Gas	Non-confidential	Yes we do see value in creating a central register	The Working Group observed that the best location for this information would depend of the type of information required. For example, if the individual sites are identified then this information could be included in ECOES. It was noted that a central register would need to be justified against the DCUSA objectives if it is to be implemented.
BUUK (representing the Electricity Network Company Ltd and Independent Power Networks Ltd	Non-confidential	Yes. Not sure that DCUSA is the right place, The DCode web site may be better.	Noted
EDF Energy	Non-confidential	EDF Energy believes that there must be clear visibility provided to Suppliers of the areas to which the restrictions detailed in Schedule 8 apply. A central	Noted

		register would seem to provide this, but it is not clear how frequently such a register would be updated and how Suppliers would know that it has been updated with the addition or removal of a Load Managed Area. If this is likely to be relatively frequent then such a register may not be the most appropriate mechanism for notifying Suppliers of a load managed area, and some form of dataflow may be more appropriate. However if this status is likely to change quite infrequently (i.e. annually) then it should be considered whether a mechanism similar to that used for Rota Load Block Alpha Identifiers may be used for notification of Load Managed Areas. Given the impact that Load Managed Areas have on customers and their ability to be able to switch tariff we also believe that information regarding Load Managed Areas should be made publicly available. This will aid transparency and enable customers to understand why and how the restrictions in Schedule 8 apply to them.	
Electricity North West	Non-confidential	This has some merit but I would also expect distributors to have such information on their websites and the legal text already has a review process in place. By having a centralised location we are however increasing the administrative burden for what is a low volume of instances. In summary we would prefer not to add this administrative burden on the industry at this stage.	Noted
Northern Powergrid	Non-confidential	Yes, this may be useful to suppliers to provide visibility in relation to potential new time of use tariffs. It may also help embedded distributors reflect any notices issued by the host DNO so that the embedded distributor does not permit something in its relationship	Noted

		with suppliers of customers on its network that the host would not. It would be worth reviewing the legal text to ensure that the proposed arrangements work where there are embedded networks as the legal drafting seems to be based on the assumption that the only distributor that may be affected is 'the Company'.	
RWE npower	Non-confidential	Yes. The DCUSA website would be an appropriate place for this register. Another potential option would be to display information on ECOES but consideration would need to be given to how this would be captured and additional changes this may require.	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Yes. We feel that the additional visibility a central register would bring would be of significant benefit to suppliers, IDNOs and any other parties who may have an interest or requirement to know about Load Managed Areas.	Noted
SP Distribution plc / SP Manweb plc	Non-confidential	From a DNO perspective we are only concerned with Load Managed Areas in our area, so a centralised register would be of little benefit, however we can see such a register being of benefit to Suppliers in that they are likely to operating on a nationwide basis and such a register would let them identify their customers who are impacted by such areas, however given the requirements of Schedule 8 where such notices are	Noted

		provided to the User, all other Suppliers and The Authority we cannot see the value of creating a central register on the DCUSA website.	
SSE	Non-confidential	SSE sees value in this, although a preferred solution would be to see a suitable flag attached directly to the MPAN within the central Registration systems, visible to all. A general view of LMAs held on an agreed website would provide useful information as long at it was kept up to date and current.	Noted
UK Power Networks	Non-confidential	There are potential advantages and disadvantages for this proposition. By having this information publically available it could assist developers in targeting areas that are not load managed, or choosing different technologies with dispersed consumption, both of which would effectively spread demand more widely.	Noted
Western Power Distribution	Non-confidential	WPD identifies load managed areas in both its Long Term Development Statement and its Miscellaneous Charging Statement, both of which are publicly available. Accordingly, WPD is neither for nor against the creation of a central register of Load Managed Areas.	Noted

Company	**Confidential/ Anonymous**	**10. Do you agree that Provisional SRNs should be replaced by an advisory notice as proposed by the Working Group? An alternative would be that no notice is issued at this stage, what is your preference?**	**Working Group Response**

British Gas	Non-confidential	The proposal to replace Provisional SRNs with an advisory notice looks reasonable	Noted
BUUK (representing the Electricity Network Company Ltd and Independent Power Networks Ltd	Non-confidential	As the consultation acknowledges, Distributor to Distributor arrangements are not considered. We think this is must before the process of what notices are required and from who to who. It seems appropriate that advisory notices are issued. However I think much more explanation is required on the different scenarios that would apply and on how and when notices would be sent	Noted
EDF Energy	Non-confidential	EDF Energy are not clear on the value of the advisory notice proposed in the draft legal text as there are no specific actions that result from the issuing of such a notice. We do however believe that a collaborative approach is required between DNOs and Suppliers to ensure that the incidence and impact of Load Managed Areas is minimised as far as possible. Where a DNO identifies that an area has the potential to become a Load Managed Areas they should be entering into a dialogue with Suppliers to see how that might be avoided, for example through the introduction of new SSCs. Given the lead times that are involved in implementing new SSCs this engagement would need to start at least six months before the DNO believes that it	The Working Group agreed that this the purpose of the advisory notice will need to be explained further in the Change Report.

		would need to declare an area as a Load Managed Area.	
EDF Energy	Non-confidential	As noted in our response to question 10 EDF Energy is not clear on the value of the advisory notice proposed in the draft legal text as there are no specific actions that result from the issuing of such a notice. We do however believe that a collaborative approach is required between DNOs and Suppliers to ensure that the incidence and impact of Load Managed Areas is minimised as far as possible. Where a DNO identifies that an area has the potential to become a Load Managed Area they should be entering into a dialogue with Suppliers to see how that might be avoided, and this needs to be far enough in advance for actions to be taken to avoid the need to notify a Load Managed Area.	Noted
Electricity North West	Non-confidential	The advisory notice is being used in advance of the Load Managed Area to pre-warn suppliers that there is an area of concern on the network, whereas the Provisional SRN was being used post the notification of the Load Managed Area and in advance of any SRN being used. It is therefore not a direct replacement. We see little benefit of having a provisional SRN and a firm SRN in preference of an SRN. If the distributor has warned the supplier that a Load Managed Area is shortly to be upon us, and load growth continues, a Load Managed Area should be announced and thereafter we should move into action that needs to be taken rather than another warning notice.	Noted
Northern	Non-confident	Yes, we support the use of advisory notices. We also suggest that 'Advisory Notice' may need to be a defined	Noted

Powergrid	ial	term within the definitions.	
RWE npower	Non-confidential	Yes.	Noted
SP Distribution plc / SP Manweb plc	Non-confidential	Our preference would be for the proposed introduction of an Advisory Notice rather than a Provisional SRN. We believe it is beneficial to give as much early warning as possible to any network constraints and see this as good business practice.	Noted
SSE	Non-confidential	SSE agrees with the Advisory Notice proposal.	Noted
UK Power Networks	Non-confidential	In principle we do agree to this, but we would suggest that the notice is defined as Advisory Notice and its formal intent and purpose are defined rather than being left to an explanation in clause 4.2.	Noted
Western Power Distribution	Non-confidential	WPD prefers that no notice is issued at this stage. Notices should only be issued when action is required to be taken.	Noted

Company	**Confidential/ Anonymous**	**11. Do specific considerations for new connections need to be included in Schedule 8? If yes, what additions are required?**	**Working Group Response**

British Gas	Non-confidential	We do not see any need for specific requirements for new connections	The Working Group noted that the majority of respondents to this question did not believe specific considerations for new connections need to be included in Schedule 8.
BUUK (representing the Electricity Network Company Ltd and Independent Power Networks Ltd	Non-confidential	Possibly, particularly if a site has limited capacity pending reinforcement	Noted
EDF Energy	Non-confidential	EDF Energy believes that new connections do need to be accounted for in Schedule 8 as it needs to be clear to Suppliers what, if any, restrictions apply to the metering that will be installed at a new connection. We believe that this should only be an issue for new connections that are 'infill' on an existing part of the network. We would assume that for new connections that are part of any new development, the new part of the network created would have sufficient capacity and would not immediately be a Load Managed Network.	Noted
Electricity North	Non-confident	New connections to the network may result in either new Load Managed Areas or alleviate existing Load	Noted

West	ial	Managed Areas dependent upon what network re-enforcement was undertaken at the time. The existing clauses adequately cover off such situations. We therefore believe that they do not need to be specifically mentioned within this schedule.	
Northern Powergrid	Non-confidential	No, we believe that issues arising from new technology and future time of use tariffs relate to new and existing connections broadly equally.	Noted
RWE npower	Non-confidential	No. New connections will be impacted by randomised offset principles and then any requests further to Security Restriction Notices and Emergency Security Restriction Notices	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	We do not believe that specific considerations should apply to new connections. The conditions which apply in a Load Managed Area have to apply to all connections which have load switching regimes to be effective.	Noted
SP Distribution plc / SP	Non-confidential	No	Noted

Manweb plc			
SSE	Non-confidential	Yes. Where these fall within existing LMAs the current mechanism is the use of Group Codes. This is not referenced at all in the Consultation. A potential solution that could be used for New Connections and existing supplies is to develop a solution based upon replicating the Group Code philosophy by utilising the last digit of the MPAN to establish a completely random load control group indicator. Where the DNO sees a need to stagger the controlled load such as space heating and hot water, it could create different time slots allocated across the 10 digits which a supplier would be obliged to utilise in that area, ensuring protection of the network.	Noted
UK Power Networks	Non-confidential	We do not believe so. Each new connection is developed and put into use within the context of Load Managed Areas as they exist at the time. We consider that the Supplier's response or the customer's response to the emergence of new or expanded Load Managed Areas at a later time should lead the Supplier to consider what changes in supply offerings it makes.	Noted
Western Power Distribution	Non-confidential	No. New connections are covered by a number of clauses in Schedule 8.	Noted

Company	**Confidential/ Anonymous**	**12. Should the definition of Capacity Headroom remain as "a margin of 15% below the maximum capacity of the Distribution System supplying a group of Customers"? If not, what should it be and why?**	**Working Group Response**

British Gas	Non-confidential	The margin of 15% below maximum capacity has been removed and replaced with an ambiguous 'minimum margin'. Our view is that the margin of 15% should remain.	The Group agreed that it the reason behind this needs to be explained in the Change Report further to show how it is relevant. **Action**
BUUK (representing the Electricity Network Company Ltd and Independent Power Networks Ltd	Non-confidential	No view expressed	Noted
EDF Energy	Non-confidential	EDF Energy believes that the definition of Capacity Headroom should remain as a margin of 15%, we do not agree with the revised definition in the draft legal text. It is imperative that all DNOs operate in a consistent manner when declaring Load Managed Areas, the revised wording would seem to allow each DNO to determine their own Capacity Headroom which is not acceptable and will not deliver a consistent customer experience. A DNO could choose to increase the margin which would have the result of increasing the likelihood of an area being declared a Load Managed Area when this may not strictly be necessary. This would then unnecessarily restrict customer choice as the DNO would need to be consulted before any tariff change could be	Noted

		applied. The Capacity Headroom must be a clearly defined and consistent margin and we believe that that the current margin of 15% is appropriate.	
Electricity North West	Non-confidential	We are more comfortable with the working group's view that this margin should be at the distributor's discretion. They are responsible for providing an efficient network as well as security of supply.	Noted
Northern Powergrid	Non-confidential	Yes, we think that it would be clearer if Capacity ~~Headroom remains~~Headroom remains as percentage approach, but for the percentage value to be defined by the DNO.	Noted
RWE npower	Non-confidential	Yes we believe that the current definition should remain and we do not agree with the changed legal text. For transparency and consistency across distributors, a percentage value is required in the definition. We believe that 15% is appropriate for network management and the associated industry processes.	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric	Non-confidential	We agree with the drafting which accompanies the Change Proposal which proposes that the Capacity Headroom should be the minimum level of margin that the DNO reasonably considers necessary to maintain Security of Supply. We feel that the value of 15% is too prescriptive and does not allow for flexibility of judgement for different scenarios.	Noted

Power Distribution plc		The test is always that the DNO is acting **reasonably** in setting the level of Capacity Headroom in any situation. In our view this drafting provides a sound balance between allowing appropriate levels of flexible judgement and ensuring that this judgement can, if necessary, be reviewed on an established legal basis.	
SP Distribution plc / SP Manweb plc	Non-confidential	We believe that the Capacity Headroom should remain at its current level.	Noted
SSE	Non-confidential	SSE believes that a margin of 15% is acceptable. This will provide adequate time for DNOs to reinforce relevant networks before they exceed their capacity. The aim must be to ensure customers are not negatively impacted due to a lack of available supply.	Noted
UK Power Networks	Non-confidential	It is reasonable that a Distribution Network Operator should be able to have some flexibility in the management of their own systems so removal of this requirement is reasonable. Removal of this limitation could allow for more flexibility for example for fault management and spikes in capacity. In the context of increasingly embedded generation rich distribution networks it has to be considered what precisely is being measured against capacity headroom, since the gross underlying will be obscured by a mix of energy producers (large, medium, small and micro level) with some sites suppressing site demand but not exporting or not exporting all of the electricity they generate. As is clear from low carbon innovation projects, the precise determination of network capability and variance in net	Noted

		network usage for consumption or production of electricity, will be an increasingly challenging exercise and equally so under the current Load Managed Area arrangements.	
Western Power Distribution	Non-confidential	WPD believes that the 15% figure is too generous. The distribution network is designed to satisfy ENA Engineering Recommendation P2/6 limits, as required by the Distribution Code. The proposed capacity headroom is substantially within the P2/6 limits. From a price control perspective it is unlikely that funding would be agreed for a proposal to reinforce assets which were only 85% loaded. Network Operators employ Load Indices (LI) as a measure of how often its EHV substation assets are potentially loaded above their rating capacity in order to meet demand. Network Operators in conjunction with Ofgem have developed a common methodology for calculating the LI. Furthermore, they have to report this information to Ofgem on an annual basis. WPD suggests that the definition of Capacity Headroom is aligned with one of the Load Indices. For example LI-3 is demand above 95%, LI-4 is demand above 100% for less than 9 hours per annum & LI-5 is demand above 100% for more than 9 hours pa. The LI measure is currently applied to EHV networks/substations where a redundancy of N-1 normally exists.	The Working Group noted that there was a split between DNOs and Suppliers in the responses to this question. It was recognised by the group that Suppliers desire consistency and assurance that DNOs will not create an increasing number of load managed areas and thus would like a defined capacity headroom. Counter to this it was noted that removing the 15% would potentially reduce the number of load managed areas. It was agreed that if the 15% is removed then there should be something within the legal text that gives Suppliers confidence that there is a clearly defined process for creating load managed areas. This will reduce the risk of variability in the customer experience. It was noted that capacity headroom is not always about managing loads but also about security of supply and managing back feeds. DB took an action to write to all DNOs seeking advice on the definition of when to trigger a load managed area. DNOs are asked to consult their network planning managers. ACTION

Company	**Confidential/ Anonymous**	**13. Should there be a limit on the frequency at which network operators can request suppliers to change load switching times?**	**Working Group Response**

British Gas	Non-confidential	Changes to load switching times will require meter configuration and customer contact. The suggestion is also that suppliers should cover the costs of this activity. There has been no meaningful dialog (as far as we are aware) that describes how frequently this capability is used within the RTS currently. There clearly needs to be a limit if suppliers are going to pick up this obligation. Based on our limited understanding we would suggest this should be not more than once every 5 years to avoid ongoing supplier costs, minimise customer impact, and to encourage effective network management and reinforcement where necessary.	The Group agreed to change the legal text such that there is an obligation to use reasonable endeavours to keep the number of changes to a minimum.
BUUK (representing the Electricity Network Company Ltd and Independent Power Networks Ltd	Non-confidential	No view expressed	Noted
EDF Energy	Non-confidential	EDF Energy believes that there must be a limit to the frequency at which DNOs can request that Suppliers change load switching times. This obviously has a direct negative impact on customers who will need to be communicated with as a result of any change, and is a very poor customer experience. It will also have a negative financial impact on Suppliers who are unable to	Noted

		optimise tariffs to the generation capacity available. We believe that DNOs should not be able to request that Suppliers change load switching times more than once a year. Any requirement to change switching times more frequently than this would indicate a fundamental failure in the process detailed in Schedule 8, the aim of which should be to minimise the number of areas that need to be declared as Load Managed Areas or which need to have Security Restriction Notices applied.	
Electricity North West	Non-confidential	Where network security is concerned the option to amend the load switching times should be one of a number of options available to them. To put any form of limitation on this is not appropriate and may result in loss of supply which must be avoided and would not be acceptable to us and the general public should this occur due to such reasoning.	Noted
Northern Powergrid	Non-confidential	No. Distributors do not know fully what challenges they may face from a combination of smart metering, innovative time of use tariffs and new low carbon technologies so it would seem inappropriate to set an artificial limit on the frequency at which network operators can request suppliers to change load switching times.	Noted
RWE npower	Non-confidential	Yes. Changes to load switching times could have significant customer impacts which will need to be considered and managed carefully. Firstly, price messaging and when load is available to customers would need to be clear. The proposed definition of Load Switching Regime can also include load limiting (and not purely changes to load switching times) which would also impact the customer. Changing the Randomised Offset Limit could result in a small change to load	Noted

		switching times but where consumers are anticipating certainty and control with the installation of a smart meter, this could have a negative effect. There will also be a cost to suppliers for managing a process to change load switching times. This will include receipt of a notice (which the legal drafting suggests will be manual) and translation of this into instructions to multiple smart meters. We have some concern over the scope of load switching that may be required based on the removal of SSC and replacement with the term load switching regime within the revised legal text.	
SP Distribution plc / SP Manweb plc	Non-confidential	Given the forthcoming roll-out of smart meters we are likely to see a large increase in load switching times as Suppliers potentially introduce time of use tariffs going forward. Each Supplier will now be responsible for their own switching times, which should see a halt to the current situation where some Suppliers 'piggyback' on the ex-PES Supplier switching regime. The issue for DNOs is that each Supplier is likely to have differing switching times even if they only vary by a matter of minutes, and they may also choose to switch loads other than just heating, thereby making it difficult for the DNOs to limit the frequency of switching times going forward.	Noted
SSE	Non-confidential	SSE believes there should be a limit. This has a direct impact upon our customers and increases the costs of operating the Supply business. Issuance of multiple changes should be kept to a minimum.	Noted
UK	Non-	Any limit on frequency of change should be decided	Noted

Power Networks	confidential	following an impact assessment based on the necessity of need for wider system security and stability against the potential for disturbance of the individual customer's demand pattern. We would expect any changes to be evidenced as part of any proposed changes.	
Western Power Distribution	Non-confidential	It is unclear whether this refers to the frequency at which the load switching times can be changed within the same group of customers or across all load managed areas collectively. WPD feels there should be no limit as Suppliers can invoke the Appeals procedure (Clause 9.1) in the event they become concerned.	Noted

Company	**Confidential/ Anonymous**	**14. In paragraph 6.4 of the legal text is 20 working days an appropriate amount of time? If not, what should this period be?**	**Working Group Response**
British Gas	Non-confidential	Without understanding the volume of customers affected it is difficult to assess how long would be required to contact customers and re-configure meters. To date we are not aware that this has ever had to happen and we would need to see much more detailed information as to the cost benefit of doing this before we embark on putting costly processes in place to notify customers of potential tariff changes.	The Group noted that the majority of the respondents agreed that 20 working days is an appropriate amount of time.
BUUK (representing the Electricity Network	Non-confidential	It depends on the circumstances. There may be future circumstances / scenarios where shorter periods are required.	Noted

Company Ltd and Independent Power Networks Ltd			
EDF Energy	Non-confidential	EDF Energy believes that 20 working days is an appropriate amount of time and could even be extended. If the process is working correctly then there should be no need to issue an Emergency SRN at all, let alone within 20 working days of the relevant SRN being issued.	Noted
Electricity North West	Non-confidential	The clause is opened ended. It does not prevent an earlier notice being issued and neither should it. The issuing of such a notice is because there is an immediate risk to the security of supply and as such no notice period should be mandated. It is also legal text that is unaffected by this change proposal and is difficult to understand how this is covered by the intent of the change proposal. No change should be made.	Noted
Northern Powergrid	Non-confidential	Yes, in normal situations 20 days seems appropriate. Click here to enter text.	Noted
RWE npower	Non-confident	Yes. Our understanding is that 20 working days only	Noted

	ial	relates to the period between the issue of a Security Restriction Notice and an Emergency Security Restriction Notice under usual circumstances.	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	We agree with the current drafting of paragraph 6.4.	Noted
SP Distribution plc / SP Manweb plc	Non-confidential	Agree 20 Working Days seems appropriate.	Noted
SSE	Non-confidential	SSE does not see why any period of time needs to be defined if there is a cause to issue an Emergency SRN. If security of supply is impacted then it should be sent out at the time the need arises.	Noted
UK Power Networks	Non-confidential	The intent, we believe, of the clause is to say that there is no point issuing an Emergency SRN so close to the start of a normal SRN. Given that the drafting includes the word "normally" we believe that there remains the	Noted

		option for Emergency SRNs closer to the date of a normal SRN starting. However we do wish to point out that in general the normal SRN is intended to deal with expected patterns of behaviour and normal system operation whereas the Emergency SRN is intended to cover more rapid and less predictable changes in behaviour and also abnormal distribution system conditions. To that extent although there is some overlap there are distinctly separate purposes to the Emergency SRN which make a working day relationship to the start of a normal SRN somewhat meaningless.	
Western Power Distribution	Non-confidential	It is unclear whether this refers to the frequency at which the load switching times can be changed within the same group of customers or across all load managed areas collectively. WPD feels there should be no limit as Suppliers can invoke the Appeals procedure (Clause 9.1) in the event they become concerned.	Noted

Company	**Confidential/ Anonymous**	**15. Are you supportive of the proposed implementation date of 1 April 2015? If no, please propose an alternate date and explain your rationale.**	**Working Group Response**
British Gas	Non-confidential	The requirement to include randomisation into smart meters is already included in the SMETS 2 specification we would suggest therefore that this change is aligned with the availability of SMETS 2 meters i.e. 1st April 2016	The Group noted that the majority of the distributors agreed with the implementation date of 1 April 2015. The Group agreed that it is important that the Change is implemented before the use of SMETS 2 meters. It was agreed that the implementation date should be June 2015 to tie in with the DCUSA releases.
BUUK (repres	Non-confident	Yes.	Noted

enting the Electricity Network Company Ltd and Independent Power Networks Ltd	ial		
EDF Energy	Non-confidential	EDF Energy believes that the implementation date of April 2015 is reasonable but that this is dependent on the lead times required to be able to deliver the required communication mechanism for Load Managed Areas (such as a central register) and agreed templates for the various notices which are the subject of other questions in this consultation.	Noted
Electricity North West	Non-confidential	Yes. Should this date not be achievable we are comfortable with a date that is pre the use of SMETS 2 meters.	Noted
Northern Powergrid	Non-confidential	Yes.	Noted
RWE npower	Non-confidential	No we are not supportive of the proposed implementation date. The smart technology required to replace teleswitches and timeswitches does not yet exist	Noted

		so we do not see the need to introduce the change as early as April 2015. We believe that the timing of any changes should aligned with the New and Replacement Obligation which we understand will now become effective post DCC go-live.	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	We agree with the proposed implementation date.	Noted
SP Distribution plc / SP Manweb plc	Non-confidential	We are supportive of the 1 April 2015 implementation date given that the expected roll out of smart meters is planned to commence later in 2015.	Noted
SSE	Non-confidential	SSE does not support this date. We cannot apply the obligations under this Consultation when the meters in use do not allow the functionality required. This can only become effective once SMETS2 meters, through DCC, are being installed. There could also be significant IT development, across various systems, to comply with these proposals that effect the same resources required for SEC parties to meet ILO. The implementation date	Noted

		could be set as December 2015.	
UK Power Networks	Non-confidential	Yes	Noted
Western Power Distribution	Non-confidential	Yes.	Noted

Company	**Confidential/ Anonymous**	**16. Are there any additional smart meter related technical, operational or governance issues that need to be considered by the working group (in the context of load switching and time switching of smart meters)? If yes, please provide additional information.**	**Working Group Response**
British Gas	Non-confidential	As stated randomisation requirements are only included in SMETS 2 smart meters we therefore do not see the need for any work in other industry groups	It was noted that this has already been discussed and the answer is effectively a no.
BUUK (representing the Electricity Network Company Ltd	Non-confidential	Not answered	noted

and Independent Power Networks Ltd			
Electricity North West	Non-confidential	We believe that they are adequately covered off by the changes made to the legal text.	Noted
Northern Powergrid	Non-confidential	Yes. The proposed changes to Schedule 8 may not be sufficient to manage all the potential issues that may arise when the existing timeswitching and teleswitching equipment is replaced with smart meter equipment. The present timeswitch and teleswitching systems will have an inherent randomisation due to several factors including: uncertainties of the original settings, ability to apply those settings accurately, the effect of time drift in mechanical timers over time, the effects of power outages etc. We have a concern that this inherent randomisation is lost when smart meters are installed as they will be able to be configured with precise switching times. As per our response to Question 8, we understand that the competitive supply market in a smart meter environment may facilitate the freedom for suppliers to offer innovative time of use tariffs of their choosing i.e. to reflect their commercial positions in relation power purchase opportunities. It may be possible that such time of use tariffs incentivise usage/load movement at local system peak and thereby risk creating new Load Managed Areas. An additional measure could be that the configuration of	The group noted the first section of the response relates to concerns that the randomisation could be lost over time. The group discussed the last paragraph of the response and noted that currently the distributor is involved in the process of defining switch times through Standard Settlement Class (SSC) configurations under the BSC. Once settlement moves to Half Hourly SSCs will no longer be in existence, thus the Distributor will not be involved. The Working Group noted that the removal of SSCs will not be for several years and is thus not an immediate issue, however, it may be a future unintended consequence of moving to HH settlement that Ofgem should give consideration to as it could increase costs to customers in the form of increased reinforcement. The Working Group noted that the legal text includes a provision for early notice of potential load managed areas which will help in these situations.

		switching times and randomisation of smart meters are subject to DNO approval at a high level to replicate the existing switching times as far as possible (The present proposal is for this principle to be applied in Load Managed Areas only). We realise that some suppliers may view this as potentially restrictive, but it could reduce the risks of creating new Load Managed Areas as a direct consequence of implementing smart meters and ultimately minimise reinforcement for peak demand and therefore minimise costs to customers in general.	
RWE npower	Non-confidential	a) Customer Perspective – we believe that more consideration needs to be given to potential customer impacts as any changes to load switching will have a direct impact on the customer's available load. Under Standards of Conduct, suppliers have an obligation to ensure that we are treating customers fairly and we would want to ensure that no requirements on the supplier in Schedule 8 conflict with this. b) Change of Supply – linked to the above on Customer Perspective, there could be potential impacts on the customer in a change of supply event. The randomised offset limit could be changed under instruction from the new supplier. c) MDD – the current process for requesting new MDD combinations is not directly linked to Schedule 8 now that the proposed legal draft has removed reference to SSC. d) Electricity Balancing – requesting suppliers to change switching times could have an adverse impact on suppliers and their position in the balancing market	a) The respondent further explained that they had a concern around confidentially that prevents the Supplier from sharing information with the customer. The group noted that if the confidentially clause was removed from the legal text then there would be concerns around ensuring that the correct message is put out around why the area is being load managed and that the message is being delivered by someone with suitable training. It was noted that the current legal text clause has been in place for many years. The group noted that this is more applicable to the security restricted than load managed areas. It was highlighted that DNOs could provide wording for Suppliers to give to customers. It was agreed that for the emergency restriction notices (where there is a material change in what the customer is experiencing) there should be the ability to provide the customer with information**. Action KK to update legal text.** b) the group agreed that this is not an issue as long as

		depending upon any changes to settlement processes.	the rules of randomised offset are followed. c) was discussed against an earlier question d) it was noted that there could be a positive or negative benefit of changing the switching time.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	We are not aware of any relevant additional issues to be considered under this Change Proposal.	Noted
SP Distribution plc / SP Manweb plc	Non-confidential	No	Noted
SSE	Non-confidential	SSE considers there are. The previously mentioned SMETS1 capability does not allow for randomisation to meet the obligations set out in the Consultation, neither is the capability to replace Group Codes. It must also be noted that meter variants are still in early development and are not being installed in any volumes.	It was noted that SMETS1 and meter variance has been previously discussed by the group.

SSE Supply	Non-confidential	There needs to be a forum or process to manage the closure of the RTS service currently in use by ALL suppliers. The ramp down of the use of this service needs to be covered and looked at once volumes meet de minimus levels. The forum also needs to consider and solution how Load Management is controlled in the SMiP, especially being that not ALL properties are going to have a WAN connected meter to enable remote operation and tariff control.	The group noted that the closure of the Radio Teleswitch is outside of the scope of the Working Group. It was noted that the ENA has a suitable forum.
UK Power Networks	Non-confidential	Changes included in the legal text should not result in a discrepancy with terminology or processes contained in other codes such as BSC.	It was noted that the respondent did not have any specific concerns but rather this response was a note of caution.
Western Power Distribution	Non-confidential	Not that WPD is currently aware of.	Noted

Company	**Confidential/ Anonymous**	**17. Are there any specific issues that need to be considered relating to the withdrawal of existing services/ technologies, i.e. RTS, Cyclo Control etc. If yes, please provide additional information.**	**Working Group Response**
British Gas	Non-confidential	We do not believe there are any discussions happening at present to discuss replacement of the current functionality offered by the RTS system. Going forward under smart metering suppliers will offer customers load switching tariffs but these will be on customer specific basis and will not have similar "group code" functionality as currently provided under RTS.	The group noted that this CP is not a like for like change with the current arrangements. The Working Group does not wish to restrict new technology to the old processes and thus is intentionally developing a change that is not like for like.

BUUK (representing the Electricity Network Company Ltd and Independent Power Networks Ltd	Non-confidential	Not answered	Noted
EDF Energy	Non-confidential	The only issues that may need to be considered are in relation to the withdrawal of the RTS system. The removal of the RTS system and the roll-out of smart meters will mean that Suppliers are likely to want to (or need to) replace meters that are currently dynamically switched with static or semi-static switching regimes. This means that Suppliers are likely to need to make some change to the current SSC as part of the replacement of an RTS operated meter with a smart meter, which will require some agreement with the DNO where customer is in a Load Managed Area. It is also the case that in many areas there are no non-RTS equivalent SSCs that a Supplier could use when they replace an RTS operated meter, including those on static or semi-static switching regimes. An exercise will need to be undertaken to ensure that appropriate SSCs are available within Market Domain Data to enable Suppliers to meet their obligations under Schedule 8, and DNO support will be required to achieve this. We	The respondent further explained that this response is similar to earlier response regarding the CP not being like for like with the current arrangements.

		believe that this is already an issue where we have to replace RTS operated meters with other legacy meters due to availability of meters, and there are no no-RTS equivalent SSCs available to maintain the customer's existing switching times.	
Electricity North West	Non-confidential	None that we are aware of at this time.	Noted
Northern Powergrid	Non-confidential	We have not noted any specific issues relating to the removal of existing services and technologies, except that the timing of the withdrawal needs to be carefully considered in relation to the completion of the smart meter roll –out (though this is a matter outside the scope of DCP 204).	Noted
RWE npower	Non-confidential	Yes, the replacement smart technologies are not yet available and timescales for this have not been confirmed.	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	We are not aware of any.	Noted

SP Distribution plc / SP Manweb plc	Non-confidential	No	Noted
SSE	Non-confidential	There needs to be a forum or process to manage the closure of the RTS service currently in use by ALL suppliers. The ramp down of the use of this service needs to be covered and looked at once volumes meet de minimus levels. The forum also needs to consider and solution how Load Management is controlled in the SMiP, especially being that not ALL properties are going to have a WAN connected meter to enable remote operation and tariff control.	Noted
UK Power Networks	Non-confidential	We consider that it would be prudent for any Supplier to publish its load switching regimes with a minimum notice period such that the distributors may assess the impact of the application of such regimes to all or some of the relevant customer's consumption. The drafting currently seems light in this respect and the aim is not to avoid the existing network constraint, only to produce a new time based peak in use to which the distributor was not appraised before the change in regime was made. For practical purposes the typical magnitude of load to be switched under the particular proposed replacement switching regime ought also to be advised by the Supplier.	The respondent further explained that this comment is in relation to the withdrawal of old tariffs. The group discussed whether Suppliers should inform DNOs of new products that focus on a certain area and provide the DNO with information on what the switching times are and whether there would be scope to stagger the switching times. It was noted that Suppliers are likely to want to keep this information confidential until it is launched. An attendee highlighted that DNOs are required to approve MDD changes and thus would receive notice through this route, however, when the current arrangements are replaced by Half Hourly settlement this information will not be known. Consideration therefore will need to be given to this area in the future when Half Hourly settlement is introduced.
Western	Non-	Not that WPD is currently aware of.	Noted

Power Distribution	confidential		

Company	Confidential/ Anonymous	18. Sections 5.3, 6.3 and 7.3 of the legal text detail the information that should be provided by a DNO issuing Notices. Is this information sufficient, if not what additional information is required?	Working Group Response
British Gas	Non-confidential	A notice based on geographical area (map or postcode) is not sufficient. Map or postcode defined regions will often span more than one DNO or LV network. Applying a notice based on postcode or region only will mean suppliers apply changes to a significant number of customer's needlessly. The only reliable way to apply the notice is based on MPAN's affected. The DNO's should hold this information at the required level but is not available to suppliers currently.	The Working Group agreed that more granular data is required at MPAN level. However it has been noted that the current Legal text does not allow this. Post Codes and MAPs cover new connections and can be provided with no issues. Ideal solution is to have a central register containing all MPANs and add as required, this should then be issued on a quarterly basis. It was questioned whether the reports would have to be Supplier specific due to possible ramifications of data protection. The Group agreed that MAPs are not required. Three options, as is, MPANs and Post Code, Supplier Specific MPAN lists. The group reached a consensus that MPAN level data should be provided. An action was taken for Working Group members to feedback at the next meeting as to whether it should be provided to all Suppliers or just the registered supplier.

BUUK (representing the Electricity Network Company Ltd and Independent Power Networks Ltd	Non-confidential	Not answered	Noted
EDF Energy	Non-confidential	EDF Energy believes that the information detailed in the relevant sections should be sufficient to enable Suppliers to identify the customers affected by the various DNO notices and the times of day into which demand can be moved or from which demand needs to be moved. In line with our response to question 20 below it must be ensured that this information is provided in a consistent manner by all DNOs and available centrally to enable Suppliers to manage this information and the impact on their customers in a consistent manner.	Noted
Electricity North West	Non-confidential	Yes, subject to the discussions on a similar question relating to the location of the Load Managed Area in the following question.	Noted
Northern	Non-confident	Yes, we believe this information should be sufficient, although there may be a need to review the information	Noted

Powergrid	ial	shared between distributors where there are Load Managed Areas associated with embedded networks.	
RWE npower	Non-confidential	The legal drafting currently allows for the notice to indicate the applicable area by map or postcode. We would wish for postcode or at least the outcode to be mandated as a minimum. We also believe that issuing a list of applicable MPANs would be useful but only if the notice can be made available electronically in a format that can be manipulated easily e.g. spreadsheet, text file. 5.3, 6.3 and 7.3 should be consistent. 5.3. need to be changed to reflect that the method should be considered reasonable by both the User and the Company and not just the Company as currently drafted.	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	We believe that the information provided is sufficient.	Noted
SP Distribution plc / SP	Non-confidential	No further information required	Noted

Manweb plc			
SSE	Non-confidential	SSE agrees with the information proposed but would like to see an obligation stating how long the Notice is going to be in effect, or some form of guidance on the period of time it is going to take to resolve the issue. This could be enacted through some regular updates to impacted suppliers to assist managing customer expectation.	Noted
UK Power Networks	Non-confidential	These sections include date and time of day relating to avoiding any increase in load. A reference to a decrease in load could be considered. In addition to the draft text days of week should be added to allow for restriction only to apply on certain days, e.g. Monday-Friday.	
Western Power Distribution	Non-confidential	There is an inconsistency between the requirements in 5.3 and 6.3 & 7.3 in that the latter two require the Company and Supplier to agree what information is reasonable. This appears to infer that the Company would have to consult all the Suppliers prior to issuing a notice. WPD feels that this would be too time-consuming. WPD suggests that all references to other methods should be removed. In other words Schedule 8 should list specific and previously agreed information (i.e. agreed during the course of this change proposal).	Noted

Company	**Confidential/ Anonymous**	**19. The Working Group considers that an adequate level of detail to summarise the nature of any Load Managed Area would be: Date Notified, postcode District/out-code (e.g. LS3) and Indicative End Date (if known)**	**Working Group Response**

		do you agree?	
British Gas	Non-confidential	As detailed in our response to question 18 we believe this should be managed at MPAN level	The Group agreed that the Post code should be provided at a higher level, date notified and the indicative end date should also be provided.
BUUK (representing the Electricity Network Company Ltd and Independent Power Networks Ltd	Non-confidential	Not sure. How would this relate to IDNO networks which may share a post code but not the load restriction?	
EDF Energy	Non-confidential	EDF Energy agrees that this level of detail would be adequate and would enable Suppliers to be able to identify the customers that are affected by the processes detailed in Schedule 8. Suppliers are of course very much reliant on the accuracy of the address data (specifically the postcode) provided by the DNOs through the registration systems in order to determine the customers affected. A potential alternative could be use the first part of the UPRN	Noted
Electricity North	Non-confident	Whilst this seems sensible it would be difficult for	Noted

West	ial	suppliers who have Metering Points connected within such an area to understand whether their actions are being helpful especially if only the out-code is provided. Perhaps a full post code may be more appropriate. If you do go down to MPAN level this at least identifies those Metering Points affected but may result in additional notification amendments to the Load Managed Area should switching of loads between substations be undertaken to manage the load connected. An indicative end date may be helpful where future re-enforcement is being undertaken but where it is being used to control the load there may not be one.	
Northern Powergrid	Non-confidential	Yes.	Noted
RWE npower	Non-confidential	It would be helpful to have brief information on the context of why the distributor has had to designate an area as a Load Managed Area. This could be shared on the central register.	Noted
Southern Electric Power Distribution plc and Scottish Hydro	Non-confidential	We agree with the Working Group's views on the level of detail required for Load Managed Area notices.	Noted

Electric Power Distribution plc			
SP Distribution plc / SP Manweb plc	Non-confidential	Yes	Noted
SSE	Non-confidential	SSE needs to understand the rationale for the need for a Summary view? Is this to provide guidance at a high level and more detailed information is available at MPAN level?	Noted
Western Power Distribution	Non-confidential	Yes, apart from the Indicative End Date.	Noted

Company	**Confidential/ Anonymous**	**20. Should there be standard templates for:** - Load Managed Area Notices - Security Restriction Notices - Emergency Security Restriction Notices **If yes, should this be in DCUSA schedule 8?**	**Working Group Response**
British Gas	Non-confidential	Yes there should also be a standard defined method of communication defined within schedule 8 of the agreement.	Noted

BUUK (representing the Electricity Network Company Ltd and Independent Power Networks Ltd	Non-confidential	Yes. This could be in DCUSA or in The DCode	Noted
EDF Energy	Non-confidential	EDF Energy believes that it is absolutely imperative that information regarding the various types of notice is provided in a consistent manner by all DNOs. All Suppliers operate on a national basis and need to be able to operate a consistent set of processes for all of their customers. We believe that this consistency would be best achieved through the inclusion of standard templates for the provision of this information in DCUSA Schedule 8. As per our response to question 9, we believe that this information should be published and maintained in a central register depending on the frequency at which such a register would be updated.	Noted
Electricity North West	Non-confidential	The schedule already identifies at a sufficient granular level the information that is needed for each of the notices. We see no reason for standard templates to be produced and that they form part of DCUSA. Any changes to such templates will increase the administrative burden of DCUSA for what is a very limited used schedule.	The Working Group noted that ENWL's view differed from that of other respondents to this question.

Northern Powergrid	Non-confidential	Yes, we think this would be good practice and the templates should be in Schedule 8.	Noted
RWE npower	Non-confidential	Yes there should be standard templates and DCUSA Schedule 8 would be an appropriate location for them.	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	We believe that there should be standard templates for these Notices and these should reside in Schedule 8.	Noted
SP Distribution plc / SP Manweb plc	Non-confidential	It makes sense to a have a standard template for these notices and we can see no reason why they cannot be included within Schedule 8.	Noted
SSE	Non-confidential	SEE believes there should be templates and that these should be standardised within Schedule 8.	Noted
UK Power	Non-confident	There would be benefits in having standard templates in order to ensure that the correct information is given and	Noted

Networks	ial	understood by the recipients, however there needs to be an element of flexibility for the provision of the required information.	
Western Power Distribution	Non-confidential	Whilst it would be preferable for there to be standard templates this is a "nice-to-have" rather than a "must-have".	The Working Group noted that having a consistent template will enable information to be automatically uploaded by systems rather than being required to do it manually. It was noted that having the MPAN level data in a CSV file using a standard template would much easier to extract. It was suggested that the strawman suggested earlier could be attached to an email and circulated to Suppliers. CA took an action to prepare a strawman with ElectraLink (to be included on agenda for next meeting). **ACTION** An attendee queried what would happen if an emergency security restriction notice was issued to a contract manager but they were not in the office to receive it. The group noted that the legal text does not restrict the distributor to sending the notice to one member of the Supplier company only.

Company	**Confidential/ Anonymous**	**21. Section 11 of the legal text places an obligation on DNO's to review LMA, SRN and Emergency SRN notices every six months, is this period appropriate? If not can you please provide an alternative period and explain your rationale.**	**Working Group Response**

British Gas	Non-confidential	We agree that the proposal seems reasonable	Noted
BUUK (representing the Electricity Network Company Ltd and Independent Power Networks Ltd	Non-confidential	Not answered	Noted
EDF Energy	Non-confidential	EDF Energy believes that it is important that LMAs, SRNS and Emergency SRNs are reviewed at least every six months. Given the negative impact on the customer experience that results from being in a Load Managed Area it is important that Suppliers are notified of the removal of any restrictions in a timely manner in order to enable to them to deliver the best customer experience possible. As noted in our response to question 9 the frequency of the updates to the areas to which the various notices apply will then determine the most appropriate mechanism for providing updates to these notices.	Noted

Electricity North West	Non-confidential	Setting a review period helps to keep impacted parties up to date with the latest situation and provides feedback on how long such notices may well need to be in place. They should not prevent however a notice being served earlier than this date where any of the notices may be revoked. There may be an argument that a compliance notice may also need to be reviewed and at a shorter timescale e.g. three months since the entitlements available to the distributor are more draconian and at the moment any such review is not catered for in the legal text. (Please see suggested text changes within the legal text question.	It was suggested that the Supplier should assume that the notice remains in force until notified otherwise. If the Distributor were to produce a complete list of LMAs every six months then the Supplier would need to review the list to check what has changed in the list. i.e. the review should not necessarily lead to the list of affected MPANs being reissued. It was noted that the current review period in the DCUSA is six months and notices are not re-issued each review. The group agreed that where a notice is revoked the Distributor should not wait for the six month review period before notifying Suppliers. It was highlighted that this is captured within the current version of the DCUSA legal text. The group noted that if notifications are not sent on a regular basis then new Suppliers would not have mpan level notifications. It was suggested that the notification strawman should have one tab with new items coloured in red. It was agreed that this should be incorporated into the draft strawman to be prepared by CA. **ACTION** The requirement to include MPAN data should be captured within the legal text. This text should also capture the frequency of the MPAN lists being issued (12 months for LMA and more frequently for SRNs and Emergency SRNs). **ACTION DB** The group agreed that wording should be included within the legal text saying that where a constrain is removed notice should be given, i.e. do not wait for the

			six month review. **ACTION**
RWE npower	Non-confidential	Yes we agree with the current drafting of 6 months. Section 11 is not consistent with Sections 6 and 7, particularly Section 7.3 (d) on what it requires the Company to do when a notice is not effective anymore. We would like this drafting to be reviewed and clarified. Section 11.1 also makes reference to Provisional and Firm SRNs which will need to be amended.	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	We believe that the obligation on DNOs should be for annual review of the notices. We do not feel it would be appropriate or particularly beneficial to review at the half-year. In our view, it would be more logical for DNOs to review any Load Managed Areas in coordination with their Long Term Development Statement timetable.	Noted
SP Distribution plc / SP Manweb plc	Non-confidential	6 months seems too short a timescale, given that a DNO will know where a LMA is and SRN and Emergency SRNs will only be issued as required, which could be infrequently, therefore we would suggest an annual review.	Noted
SSE	Non-confident	SSE does not believe 6 months is an appropriate period. LMAs should be under constant review and especially	Noted

	ial	following any reinforcement activity to identify if the LMA can be withdrawn as soon as possible. This ongoing obligation of 6 months has no onus on the DNO resolving or taking any action to address the issue of the LMA, SRN and E-SRN. Review may just identify it is still required so no action is needed therefore a different obligation is required to manage and actively promote a resolution over time. The process of withdrawal of Notices under this Consultation needs to be considered further.	
UK Power Networks	Non-confidential	This is sufficient.	Noted
Western Power Distribution	Non-confidential	WPD suggests that the review is on an annual basis. This is in line with other industry reporting requirements which may take into account load managed areas, such as annual Load Indices submissions to Ofgem, annual issue of Long Term Development Statements, annual issue of Miscellaneous Charging Statement etc.	Noted

Company	**Confidential/ Anonymous**	**22. It is proposed that reference to SSCs is removed in the legal text and has been replaced by reference to Load Switching and Load Switching Regimes. Do you agree with these changes, if not please provide your rationale.**	**Working Group Response**
British Gas	Non-confidential	We disagree with the proposal. The SSC currently defines Time Pattern Regimes and also defines whether the SSC is capable of load switching (within the TPR). The SSC is managed via the Market Domain Data	The Working Group noted that they had previously discussed this area and identified issues with it. It was agreed that DCP 204 should capture the current processes and be fit for purpose under smart HH

		process and all suppliers have visibility of the availability of SSCs in any given DNO area. I'm not aware of any industry discussion to replace this with a Load Switching Regime or what additional data a Load Switching regime would contain. Load Switching Regime is also not an industry recognised term. The most sensible approach seems to be to continue to use the SSC with an appropriate randomised offset.	settlement.
BUUK (representing the Electricity Network Company Ltd and Independent Power Networks Ltd	Non-confidential	n/a	
EDF Energy	Non-confidential	EDF Energy agrees that the references to SSCs within the clauses of the legal text should be replaced with Load Switching Regimes. This reflects the additional functionality available via a smart meter which could be used to manage demand, such as randomisation and load limiting capabilities. Making changes to the randomisation settings within a smart meter to manage the coincidence of demand would be a much simpler and process than changing the SSC and would have much	It was noted that this suggestion had been discussed against an earlier question. The group agreed that it would be progressing with this approach.

		less of a negative impact on the customer, and so should be included as an option for demand management. We do however believe that it would be useful to reference SSCs within the definition of Load Switching Regime to reflect the fact that SSCs are one form of Load Switching Regime that can be deployed by Suppliers.	
Electricity North West	Non-confidential	Yes. By such a removal we can cover off both instances of legacy and smart metering installations. To retain the term would result in providing additional clauses to cover off both instances and a further change at a later data should Standard Settlement Classes be no longer required due to all sites being settled on an Half-Hourly basis.	Noted
Northern Powergrid	Non-confidential	Yes, although we have provided comments on the definitions of these term in the draft legal text.	Noted
RWE npower	Non-confidential	npower are not in favour of removing the reference to Standard Settlement Configuration (SSC). An SSC is an existing defined term which will endure with the roll out of smart metering. The definition of SSC in DCUSA refers to the Balancing and Settlement Code (BSC). This is important to maintain the link between the desire for distributors to manage demand on their network and the industry processes which govern how consumption is allocated to particular time periods for electricity settlement. Load Switching and Load Switching Regime are not terms that are defined in any other industry code.	Noted

		Alternatively, 'Load Switching' and 'Load Switching Regime' will need to be defined within the Balancing and Settlement Code and the processes for allocating energy to the correct settlement period defined before changes are made to this schedule. The additional load management functionality that is encompassed by the proposed terms includes non-standard load switching and load limiting.	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	We agree with the proposed changes.	Noted
SP Distribution plc / SP Manweb plc	Non-confidential	While we have no issue with removing the reference to SSCs in the legal text and replacing it with reference to Load Switching and Load Switching regimes, we have a concern that the BSC and in particular Market Domain Data will continue to use SSCs as a term of reference, thereby leading to potential confusion within the industry. In addition it should be noted that SSCs are not exclusively used for Load Switching.	Noted
SSE	Non-	SSE agrees with this proposal.	Noted

	confidential		
UK Power Networks	Non-confidential	Yes. It would be beneficial for the particular Load Switching regime's timings, ie time(s) on and time(s) off, were to be presented to Distribution Network Operators either bilaterally or generically in a published manner. It would for the same reasons be beneficial for average estimated magnitudes of switchable usage, for a switched metering point demand, to be also stated by Suppliers.	Noted
Western Power Distribution	Non-confidential	Yes. However, the definition of load switching probably encompasses every switch in a customer installation. WPD suggests that this definition is amended by including reference to this switching being at the behest of the metering system i.e. means the switching of electrical loads in the premises of a Customer by means of a Switching Device directed by a Metering System.	It was agreed that SSC will be retained in MDD.

Company	**Confidential/ Anonymous**	**23. Do you have any other comments on the proposed legal text?**	**Working Group Response**
British Gas	Non-confidential	We do not have any further views on the legal text	Noted
BUUK (representing the Electrici	Non-confidential	n/a	

ty Network Company Ltd and Independent Power Networks Ltd			
EDF Energy	Non-confidential	EDF Energy have the following comments on the legal text: • As noted elsewhere in this response we do not agree with the proposed changes to the definition of Capacity Headroom. • As noted elsewhere in this response we believe that the definition of Load Switching Regime should include a reference to SSCs for clarity, on this basis the definition of SSC would need to be remain within this schedule rather than being deleted. • There are multiple instances (for example section 5.1(a)) where the term 'timing of load switching' has been replaced with 'Load Switching Regimes'. We do not believe that these changes are required, as they do not add to the clarity of the legal text. • In section 6.1(b) we believe 'new applications for' should read 'new applications of'. Sections 6.3 (b) and 7.3 (b) include the addition of the term 'added' in relation to demand, it is not clear how Suppliers would be able to control whether customers add demand through the purchase of new electrically	With regards to capacity headroom, the group noted that the respondent wished for it to remain as it currently is. The group reviewed the definition of capacity headroom and amended it to remove the reference to 15%.

		operated equipment and so we believe that this addition should be removed.	
Electricity North West	Non-confidential	Yes, Clause 11.1 needs the following amendments to align with early deletions of such text The Company shall, no later than the later of six months after its Effective Date or six months after its last review, review every Load Managed Area Notice, ~~Provisional SRN, Firm~~ SRN and Emergency SRN issued by it pursuant to this Schedule 8 which is still in force. ..... As indicated earlier we should also consider a three month review for any Compliance Notices. If agreed clause 11.1 should be amended as follows: The Company shall:~~,~~ (a) no later than the later of six months after its Effective Date or six months after its last review, review every Load Managed Area Notice, ~~Provisional SRN, Firm~~ SRN and Emergency SRN; and (b) no later than the later of three months after its Effective Date or three months after its last review, review every Compliance Notice; issued by it pursuant to this Schedule 8 which is still in force.	

RWE npower	Non-confidential	Unless there is a particular rationale from distributors for Section 8 Confidentiality to remain within the Schedule, we think this should be removed. Not being able to provide information to consumers seems to be in conflict with the desire to be open and transparent with our customers. It also may prevent distributors from being able to display information that has been proposed around Load Managed Areas on the DCUSA website. 6.6 (a) still contains reference to Provisional SRN which will need to be changed.	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Apart from our response under Q26, we have no further comments.	
SSE	Non-confidential	Section 5.3bii – Typo - Responsibility. This should be Responsibly	
UK Power Networks	Non-confidential	No	

Western Power Distribution	Non-confidential	WPD feels that the number of notices is excessive, that the differences between some of them are relatively minor and this makes the requirements a little confusing. For example, should the Advisory Notice and Emergency SRN be abandoned and the Compliance Notice re-badged as the Emergency SRN? Clause 7.7. Customers generally have the right to be and to remain connected. WPD has reservations about the legality of de-energising particular Customers for a breach of the Agreement by a Supplier. Furthermore, it is unlikely to be practicable for a Company to de-energise only customers associated with a particular Supplier. Clause 9.1 provides for an escalation procedure in the event of a dispute and this would be preferable to disconnecting supplies. Network Operators can invoke Distribution Code – Operating Code 6 (Demand Control) to safeguard the network. Clause 8.1 requires re-wording. The references to an "incident on the total system" and "estimated time of return to service" are not relevant. The clause also refers to "notices". This would include Load Managed Area notices, which are probably going to be in the public domain anyway. Clause 10.2 – 10.4. WPD questions the need for these clauses given the action that Suppliers are required to take when an Emergency SRN is issued i.e. that no particular speed of response is required. In its opinion Clause 10.1 should be sufficient. There may be a case for considering these clauses in relation to the issue of a Compliance Notice.	

Compa	**Confide**	**24. Are there any alternative solutions or matters**	**Working Group Response**

ny	ntial/ Anonymous	that should be considered within the Change Proposal?	
British Gas	Non-confidential		
BUUK (representing the Electricity Network Company Ltd and Independent Power Networks Ltd	Non-confidential		
EDF Energy	Non-confidential	EDF Energy believes that it is imperative that any changes to Schedule 8 must ensure that there is no negative customer impact as a result of implementing the changes. The successful roll-out of smart metering is reliant on customer engagement and support, and any changes related to smart metering that could be perceived as being negative could jeopardise Suppliers' ability to achieve their roll-out targets and the delivery of the associated benefits of smart metering. It is also important that implementing this change does not just mean a transfer of costs, with the costs avoided	

		by DNOs being instead placed on Suppliers and their customers. We need to ensure that money is spent where it is most effective, which may be in reinforcement of the network, and that any process is affordable for customers and delivers fair value.	
Electricity North West	Non-confidential	No.	
Northern Powergrid	Non-confidential	Please see our response to question 8 and 16.	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Not that we are aware of.	
SP Distribution plc / SP Manweb plc	Non-confidential	No	

SSE	Non-confidential	All alternative solutions and considerations have been raised in the appropriate Consultation questions themselves.	
UK Power Networks	Non-confidential	We consider that some risks may arise in the near future with smart appliances that migrate their consumption to times of low electricity cost. It is not clear at this time to what extent the Supplier will be in control of such smart appliance behaviour, downstream of the meter, or whether control is limited to the variability in any pricing signals conveyed by the Supplier. Such appliances are 'switched' in response to Supplier signals, principally energy costs, but we believe that consideration also needs to be given to the communication of 'period avoidance' signals as a proxy for the typical Supplier switched demand. Additionally, industry research has demonstrated that basic variable pricing signals can drive notable changes in customer demand patterns without the presence of automated Switching Devices. We note that the proposal does not move to include such tariff led schemes, which could in the future impact Capacity Headroom as do the currently defined Load Switching Regimes. We would not be able to support the current change proposal unless it could be confirmed that DNOs will be able to apply Demand Control Measures to any tariff schemes that impact network Capacity Headroom, either as part of the proposed terms of Schedule 8 or within the scope of DCUSA terms elsewhere.	
Western Power Distribution	Non-confidential	WPD suggests that Company powers under Distribution Code – Operating Code 6 (Demand Control) are taken into account when considering the actions to be included in relation to Emergency SRN.	

Questions to be answered by DNOs/IDNOs

Company	Confidential/ Anonymous	25. Do Load Managed Areas currently exist on your network, and where are they located?	Working Group Response
British Gas	Non-confidential		
BUUK (representing the Electricity Network Company Ltd and Independent Power Networks Ltd	Non-confidential	No	
EDF Energy	Non-confidential		
Electricity North West	Non-confidential	We do not have any current Load Managed Areas.	

Northern Powergrid	Non-confidential	We are not aware of any Load Managed Areas in our network. Click here to enter text.	
RWE npower	Non-confidential	n/a	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Yes – please refer to the attachment submitted with our response for details.	
SP Distribution plc / SP Manweb plc	Non-confidential	There are none within the ScottishPower area. Manweb area currently has the following Load Managed Areas, namely for Cyclo Control and the post codes for these areas are CH49 8JS, CH49 8JR, CH46 9SE and CH61 7ZU.	
SSE	Non-confidential		
UK Power	Non-confident	Yes. These are provided along with this response.	

Networks	ial		
Western Power Distribution	Non-confidential	Yes. WPD has load managed areas in its South West licence area only.	

Company	Confidential/ Anonymous	26. What additional obligations does there need to be within Schedule 8 of DCUSA to notify other distributors that are associated or may become associated with Load Managed Areas and the other distributor obligations to notify Suppliers connected to their network?	Working Group Response
British Gas	Non-confidential		
BUUK (representing the Electricity Network Company Ltd and Independent Power Networks Ltd	Non-confidential	We think further work on how this would apply to embedded networks and on the processes that would be in place before we are able to respond to this. We also note that there may be private networks that would be impacted. There may be third party networks (IDNO or private) which have embedded generation connected to them such generation could impact on the need and requirements for demand restriction notices on both the 3rd party network and the upstream DNO network. Therefore, we feel there needs to be consideration as to how the arrangements for such generation are incorporated into a smart grid scenario. Whilst we are not party to the working group we would be prepared to meet or contribute on an ad hoc basis to look at specific arrangements for IDNO's.	

EDF Energy	Non-confidential		
Electricity North West	Non-confidential	A Maximum Import Capacity is agreed with the downstream distributor within a bi-lateral connection agreement to which the upstream distributor is obliged to provide so there should not be an issue over demand control. Any provisions, at the time of the connection or at any future stage, for demand control need to be catered for within such an agreement since they are specific to that connection point. We see no reason therefore to amend Schedule 8 by including distributor to distributor obligations. On the last point all distributors have an obligation to notify suppliers where demand control exists, so if there is a provision within a bi-lateral agreement when the downstream distributor is notified of a Load Managed Area that affects them they are onwardly obliged to notify the suppliers of the affected area due to the obligation to comply with schedule 8 covered under DCUSA clause 31.	
Northern Powergrid	Non-confidential	We believe that this can be simply dealt with by the distributor with a load managed area sending notices to both suppliers and embedded distributors and by making all DCUSA parties aware via DCUSA. Similarly if the Load Managed Area was in an embedded network, the embedded distributor should advise suppliers, the host distributor and all DCUSA parties.	
RWE npower	Non-confidential	n/a	

Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	DNOs should notify IDNOs (and DNOs with embedded networks) of their Load Managed Areas and any associated Security Restrictions. These parties should also be obliged to shadow any applicable host DNO demand controls and also to notify suppliers of requirements to apply the relevant measures in relation to their embedded networks.	
SP Distribution plc / SP Manweb plc	Non-confidential	Obligation needs to be put on Distributor, who has Load Managed Area to advise an associated Distributor that such an area exists, also obligation should be put on the Distributor who may become associated with a Load Managed Area to ascertain this information from the Distributor who has the Load Managed Area. These obligations should be added to the legal text within Section 8.	
SSE	Non-confidential		
UK Power Networks	Non-confidential	With the emergence of competition in distribution since the Utilities Act 2002, it is the case that IDNOs will need to be aware of any upstream distributor's Load Managed Areas within which their particular nested inset network is connected. Open publication of Load Managed Areas to all DCUSA parties would assist on that matter.	
Western	Non-		

Power Distribution	confidential		

Company	Confidential/ Anonymous	27. How often are emergency SRNs used?	Working Group Response
British Gas	Non-confidential		
BUUK (representing the Electricity Network Company Ltd and Independent Power Networks Ltd	Non-confidential	We don't have any	
EDF Energy	Non-confidential		
Electricity North	Non-confident	To our knowledge we have never issued one.	

West	ial		
Northern Powergrid	Non-confidential	As are not aware of any Load Managed Areas in our network, SRNs will not have been issued. Click here to enter text.	
RWE npower	Non-confidential	n/a	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	In our experience, these are used very rarely but they may become more frequently used in future.	
SP Distribution plc / SP Manweb plc	Non-confidential	Very rarely.	
SSE	Non-confidential		

UK Power Networks	Non-confidential	Emergency SRNs are used infrequently.	
Western Power Distribution	Non-confidential	WPD does not recollect ever having to employ an Emergency SRN.	

Questions to be answered by Suppliers

Company	Confidential/ Anonymous	28. Are you aware of the existence of load managed areas and do you understand where they are located?	Working Group Response
British Gas	Non-confidential	We do not get formal notification load managed areas and are not aware where these are located	
BUUK (representing the Electricity Network Company Ltd and Independent	Non-confidential		

Power Networks Ltd			
EDF Energy	Non-confidential	EDF Energy is not aware of the existence of any load managed areas, if there are currently any in existence this would be clear evidence that the current process for notification of these areas is not working or fit for purpose.	
Electricity North West	Non-confidential	Not applicable	
Northern Powergrid	Non-confidential		
RWE npower	Non-confidential	We are aware of the existence of load managed areas but are unclear on whether the information we have is up to date.	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	N/A	

SP Distribution plc / SP Manweb plc	Non-confidential		
UK Power Networks	Non-confidential		
Western Power Distribution	Non-confidential	N/A	

Company	**Confidential/ Anonymous**	**29. What would a supplier do when they get an advisory notice?**	**Working Group Response**
British Gas	Non-confidential	Contact DNO to discuss requirements and how we work together to resolve issue	
BUUK (representing the Electricity Network Company Ltd	Non-confidential		

and Independent Power Networks Ltd			
EDF Energy	Non-confidential	As noted in our response to question 10 EDF Energy is not clear on the value of the advisory notice proposed in the draft legal text as there are no specific actions that result from the issuing of such a notice. We do however believe that a collaborative approach is required between DNOs and Suppliers to ensure that the incidence and impact of Load Managed Areas is minimised as far as possible. Where a DNO identifies that an area has the potential to become a Load Managed Area they should be entering into a dialogue with Suppliers to see how that might be avoided, and this needs to be far enough in advance for actions to be taken to avoid the need to notify a Load Managed Area.	
Electricity North West	Non-confidential	Not applicable	
Northern Powergrid	Non-confidential		
RWE npower	Non-confidential	Flagging the risk of any potential operational constraints on the network will give suppliers to opportunity to consider this within any future planning and potential customer impacts. We are unable to comment on a specific process.	

Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	N/A	
SP Distribution plc / SP Manweb plc	Non-confidential		
SSE	Non-confidential	SSE would undertake action to initiate a project to address the required actions. This would include establishing reports to identify our potentially impacted customers and drafting suitable communications to those customers to notify them of the changes required. SSE would also be seeking assurances from the relevant DNO that it was investigating the cause of the Notice and to work jointly with them to obviate the need for the introduction of a LMA.	
UK Power Networks	Non-confidential		

Western Power Distribution	Non-confidential	N/A	

Company	Confidential/ Anonymous	30. When do suppliers expect to commence removing existing equipment that directly controls customers load and replacing it with smart meters? Are there any specific issues relating to "timing" that need to be considered in the development of this proposal.	Working Group Response
British Gas	Non-confidential	This will depend on the requirements of each customer. If there is genuine heating load on site that requires switching then this will be driven by the availability of 5 terminal smart meters. Our understanding is that these will not be available at the start of smart roll-out as manufacturers are concentrating on the bulk non-load switching market. We would only be able to replace non-heating load customers with standard smart meters initially. We are not anticipating a 5 terminal smart meter being available until back end of 2016 at the earliest.	
BUUK (representing the Electricity Network Compan	Non-confidential		

y Ltd and Independent Power Networks Ltd			
EDF Energy	Non-confidential	EDF Energy will expect to replace equipment with switched load and replace it with smart meters only once the DCC has gone live and when suitable SMETS 2 compliant metering	
Electricity North West	Non-confidential	Not applicable	
Electricity North West	Non-confidential	Not applicable	
Electricity North West	Non-confidential	Not applicable	
Northern Powergrid	Non-confidential		
RWE npower	Non-confidential	The smart metering technology is not available to replace equipment that directly controls customers' load and timescales for it being available are not confirmed. Therefore, npower cannot comment on when we	

		anticipate replacing existing metering.	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	N/A	
SP Distribution plc / SP Manweb plc	Non-confidential		
SSE	Non-confidential	Although this is subject to many factors, including availability of SMETS2 variants and development of supporting systems, processes and procedures, and items detailed in previous questions, it is anticipated that this would be during 2016.	
UK Power Networks	Non-confidential		
Western	Non-	N/A	

Power Distribution	confidential		

Questions to be answered by DCC

Company	Confidential/ Anonymous	31. What information will you need from DNO's regarding the location of Load Managed Areas to enable you and your service providers, especially the communications service providers, to ensure that there is adequate WAN provision in the locations affected?	Working Group Response
British Gas	Non-confidential		
BUUK (representing the Electricity Network Company Ltd and Indepen	Non-confidential		

dent Power Networks Ltd			
DCC	Non-confidential	Any reasonably standard GIS data that can be used to define the location of Load managed areas could be used by Communications Service Providers to check against their coverage models. Postcode information will be used to query the SMWAN Coverage Database, so a list of postcodes might be the most helpful data format.	
EDF Energy	Non-confidential		
Electricity North West	Non-confidential	Not applicable	
Northern Powergrid	Non-confidential		
RWE npower	Non-confidential	n/a	
Southern Electric Power Distribution plc and	Non-confidential	N/A	

Scottish Hydro Electric Power Distribution plc			
SP Distribution plc / SP Manweb plc	Non-confidential		
SSE	Non-confidential		
UK Power Networks	Non-confidential		
Western Power Distribution	Non-confidential	N/A	

Company	**Confidential/ Anonymous**	**32. How soon will it be known where enduring areas of no WAN will be? How will this information be provided to DCC Users and other interested industry parties?**	**Working Group Response**
British Gas	Non-confident		

	ial		
BUUK (representing the Electricity Network Company Ltd and Independent Power Networks Ltd	Non-confidential		
DCC	Non-confidential	DCC is planning to publish coverage data during August that will set out by full postcode, for each Communications Service Provider (CSP) Region, where coverage will be available either at the end of 2015, between 2016 and 2020 or where areas may potentially fall into an enduring area of no SMWAN. The data published at this point will be 90% accurate with this accuracy being progressively improved on a quarterly basis until the start of Smart Meter roll-out. More info on enduring 'no WAN' is provided in the DCC Statement of Service Exemptions, currently being consulted on here: https://www.gov.uk/government/consultations/dcc-procurement-strategy-and-statement-of-service-exemptions	
EDF Energy	Non-confident		

	ial		
Electricity North West	Non-confidential	Not applicable	
Northern Powergrid	Non-confidential		
RWE npower	Non-confidential	n/a	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	N/A	
SP Distribution plc / SP Manweb plc	Non-confidential		

SSE	Non-confidential		
UK Power Networks	Non-confidential		
Western Power Distribution	Non-confidential	N/A	