



## **DCUSA Change Report**

---

DCP 153 - Service Level Agreement for  
Resolving Network Operational Issues

## 1 PURPOSE

- 1.1 This document is issued in accordance with Clause 11.20 of the DCUSA and details DCP 153 - Service Level Agreement for Resolving Network Operational Issues.
- 1.2 The voting process for the proposed variation and the timetable of the progression of the Change Proposal (CP) through the DCUSA Change Control Process is set out in this document.
- 1.3 Parties are invited to consider the proposed legal drafting amendments (Appendix B) and submit their votes using the form attached as Appendix C to [dcusa@electralink.co.uk](mailto:dcusa@electralink.co.uk) no later than **8 August 2013**.

## 2 BACKGROUND

- 2.1 Whilst Suppliers are installing meters they are identifying network issues that are dangerous and are preventing a meter exchange from taking place.
- 2.2 Detailed work has already been carried out by the Energy Network Association's (ENA) Smart Meter Operations Group and Meter Operators to categorise the network issues that are being, or could be, identified whilst attending a customer's property. This work has been used to create a new set of 'Asset Condition Codes' within the Master Registration Agreement's (MRA) Data Transfer Catalogue.
- 2.3 Data Transfer Catalogue (DTC) Change Proposal 3336 'Revisions to the Asset Condition Reporting Process - Revision of D0126<sup>1</sup> and D0135<sup>2</sup>' was implemented in December 2012 to introduce the Asset Condition Codes and thus standardise the methods for reporting network issues. It also places an obligation on network owners to notify the supplier via the D0126 once the issue is rectified for Category A and B situations.
- 2.4 DCUSA Change Proposal (DCP) 153 'Service Level Agreement for Resolving Network Operational Issues' has been raised by British Gas seeking to build on DTC CP 3336, by introducing Service Level Agreements (SLAs) by which Distributors need to have carried out the work required to rectify the issues that have been brought to their attention, for the most urgent Asset

---

<sup>1</sup> D0126 - Action Taken to Make Safe

<sup>2</sup> D0135 - Report Possible Safety Problem

Condition Code Categories A and B. Additional information on the CP is provided in the CP form attached as Appendix A.

- 2.5 The introduction of SLAs will support the installation of smart meters, AMR meters and also legacy meter exchanges. It should be noted that these SLAs will endure beyond the smart meter roll out unless subsequently varied.

### **3 DCP 153 WORKING GROUP**

- 3.1 The DCUSA Panel established a Working Group to assess DCP 153. The Working Group met on six occasions and was comprised of Supplier, Distributor, Meter Operator and Ofgem representatives.
- 3.2 Meetings were held in open session and the minutes and papers of each meeting are available on the DCUSA website – [www.dcusa.co.uk](http://www.dcusa.co.uk).
- 3.3 The Working Group discussed the CP and developed a detailed consultation document (Appendix D) to gather information and feedback from market participants. Based on the consultation responses received the Working Group developed a straw man document which set out the proposed DCP 153 DCUSA legal text amendments.
- 3.4 This straw man document was subject to a further consultation (Appendix E). Following the close of this consultation, the Working Group further refined the proposed legal text. The final version of the DCP 153 legal text is provided as Appendix B.

### **4 DCP 153 – CONSULTATION ONE**

- 4.1 The first DCP 153 consultation was issued on 26 September 2012. The consultation was circulated to DCUSA Parties, the Association of Meter Operators, Consumer Focus and Ofgem.
- 4.2 The consultation document (Appendix D) set out the Working Group's discussions and initial thoughts regarding the network SLAs. The consultation allowed the Working Group to gather information from market participants on current practices and, based on the responses received, refine the SLAs.
- 4.3 There were 13 responses received to the consultation. A summary of the responses received, and the Working Group's conclusions are set out below.

The full set of responses and the Working Group's comments are provided in Appendix D.

**Question 1 - Do you understand the intent of the CP?**

- 4.4 The Working Group noted that the all respondents understood the intent of the CP.

**Question 2 - Are you supportive of the principles of the CP?**

- 4.5 The Working Group noted that all respondents were supportive of the principles of the CP.
- 4.6 A Distributor respondent noted that they support the principles in general but highlighted that, in their view, the consultation process was weakened because there was no assessment of the projected volumes of work. This makes the required distribution activity difficult to scope. The Working Group discussed this comment at length and noted that the Department for Energy and Climate Change (DECC) has published very high level details on planned smart meter installations. It was agreed by Working Group members that determining the likely volumes of distribution network issues sits outside of the scope of DCP 153.
- 4.7 Another respondent stated that the CP needs to adequately balance the needs of Suppliers, Distributors and therefore customers. The respondent highlighted the need for the CP to give consideration to exceptional circumstances such as force majeure events. The Working Group subsequently received legal advice that the current force majeure clause in the DCUSA (Section 3, Clause 55) will cover the network SLAs introduced by DCP 153.

**Question 3 - Do you agree with the definition for each category?**

- 4.8 The Working Group noted that there were no respondents that disagreed with the proposed asset condition categories, as set out in the consultation document.
- 4.9 One respondent highlighted their concerns that there may be inconsistent categorisation of network issues by Meter Operators and by Network Operators. The Working Group noted that the Energy Network's Association (ENA) and Meter Operators are working together to develop a

guidance document which may resolve this issue. This document is referred to as the Meter Operation Code of Practice Agreement (MOCOPA) Guidance Document<sup>3</sup>.

**Question 4 - Do you agree that the Master Registration Agreement (MRA) Asset Condition Categories introduced by DTC CP 3336 should be replicated in the DCUSA?**

4.10 The Working Group noted that the majority of respondents agreed that the MRA Asset Condition Categories should be replicated in the DCUSA. The Working Group members agreed that this option was their preferred approach.

**Question 5 - The proposer of DCP 153 does not believe that SLAs should be introduced for Category C as it is not urgent and does not affect the meter exchange. Do you believe it is reasonable for the DNO/LDNO to plan this work as they feel is best?**

4.11 The Working Group noted that all respondents agreed that SLAs should not be introduced for Category C situations.

**Question 6 - Distributors: What are your self imposed turnaround times for resolving network issues at the moment?**

4.12 The Working Group noted that some respondents had self imposed targets at present, which would aid the Working Group in setting the SLAs. It was noted that these targets are based on current volumes and it is expected that the number of network issues identified will increase as a result of the smart roll out.

**Question 7 - Distributors: Does this differ in an emergency situation?**

4.13 The majority of Distributors stated that their response time for emergency situations was within 3 to 4 hours. The Working Group noted the response times given by each Distributor.

**Question 8 - Distributors: How do you expect these to change under the smart metering roll out?**

---

<sup>3</sup> The latest version of the Meter Operation Code of Practice Agreement (MOCOPA) Guidance Document is available on the following webpage:  
<http://www.mocopa.org.uk/ramanualagreement.html>

4.14 The majority of Distributor respondents to this question highlighted the need for accurate smart roll out forecasts from Suppliers to aid them in planning their resources. It was noted that the current uncertainty around roll out volumes makes it difficult to determine the impact on response times.

**Question 9 - Do you agree with the proposed SLAs and are the timescales reasonable and do you believe category A incidents should only be reported by telephone?**

4.15 The Working Group noted that the majority of respondents agreed with the proposed SLAs.

4.16 All respondents agreed that Category A incidents should be reported by telephone only.

**Question 10 - Is the proposal that Category B visits should be scheduled within 10 days reasonable?**

4.17 The Working Group noted that the majority of respondents agreed with the proposal that Category B visits should be scheduled within 10 Working Days of receiving the D0135 flow.

4.18 One respondent suggested that the requirement to meet the SLAs could be subject to Suppliers collectively keeping volumes within pre-determined limits. The Working Group discussed this comment and agreed that the concept should be incorporated into the DCP 153 legal text.

**Question 11 - Distributors: What will be the impact of these SLAs on resources? Would you ramp up internal resources or set up contracts with external organisation?**

4.19 The majority of respondents to this question highlighted the need for more information from Suppliers on roll out forecasts to enable them to answer this question.

4.20 One respondent suggested that the Distributor could be released from the SLA requirements under certain pre-determined criteria. The respondent noted that this would alleviate concerns around volume growth. The Working Group discussed this suggestion and agreed that it would be

sensible to link the SLAs to smart meter roll out forecasts. It was agreed that if the actual roll out volumes were above the forecasted volume by a set amount, the SLAs should not apply. In these circumstances, the SLAs would still need to be reported, but below target performance would not be deemed a failure.

**Question 12 - For category B incidents, do you think that there could be different service levels for different types of incident?**

4.21 The Working Group noted that the majority of respondents to this question did not want different service levels for different types of Category B incidents.

**Question 13 - Do you think it is reasonable for Meter Operators to provide a photo of all category B incidents?**

4.22 The majority of Distributor respondents to this question agreed that photos should be provided and highlighted that the provision of photos would be of great benefit. The majority of Supplier respondents disagreed, noting the difficulties associated with this suggestion.

4.23 The Working Group discussed the responses. It was noted that if the Distributor has a photo there is more likely to be a successful outcome for the customer. However, equipment would need to be provided to field staff, systems would need to be updated to store and transmit the photos and the photos would likely have a large file size and thus high storage cost.

4.24 The Working Group noted that the provision of photos may provide significant benefits, however, it was agreed that the provision of a photo could not be mandated as the systems to support this would need to be developed and it is outside of the scope of DCP 153.

**Question 14 - Should Distributors communicate the planned visit date to the Supplier?**

4.25 The Working Group noted that the majority view of the consultation respondents and those present at the meeting was that it is reasonable to send notification of the appointment.

**Question 15 - Distributors: How do you envisage scheduling these**

**appointments, would it be am/pm (as defined in the guaranteed standards documentation), all day or a two hour slot?**

4.26 The Working Group noted that the majority of DNOs respondents provide am/pm slots, however, in accordance with the Electricity (Standards of Performance) Regulations 2010, a two hour slot must be provided if requested.

4.27 The group agreed that for the purposes of the SLAs it should be stated that the appointment information should be provided. Current scheduling practices would not be affected by this.

**Question 16 - How could Distributors provide this information to Suppliers if not via the D0126?**

4.28 Based on the responses received the Working Group agreed that the D0126 flow would be the best way forward. However, it was noted that an amendment to the flow would be required.

**Question 17 - An alternative is that the Distributor does not inform the Supplier of the scheduled visit date, but only notifies the Supplier once the job is complete. Is this Alternative reasonable?**

4.29 The Working Group noted that the majority of respondents were supportive of not informing the Supplier of the scheduled visit date in advance but rather sending notification once the job is complete. The Working Group discussed this and agreed that such an approach would work against acting positively to enhance the customer experience.

4.30 It was highlighted that if the Supplier knows the date that the Distributor will visit, the customer experience can be enhanced by the MOP attending on the same day.

4.31 The group noted that in some instances the Distributor may have to visit the site more than once. It was highlighted that the greater the amount of information provided by the MOP, the more likely that the job will be completed on the first visit. If the visit is booked and the flow to the Supplier sent then if the job cannot be completed by the Distributor there will be feedback, which over time should help to improve the information passed to the Distributor. The group agreed that a singular D0126 flow should be sent. If later visit dates are required then a further D126 is not

required.

**Question 18 - It proposed that reporting on performance against the SLAs should be within 15 working days of the end of each calendar month on jobs completed within the month. For example, for jobs completed in January were each of those jobs completed within the SLAs. Do you agree with this proposal? If not, what alternative would you suggest?**

4.32 The majority of respondents to this question agreed with the proposed timescales for the Distributor SLA reporting. After discussing the responses received, the Working Group agreed that reporting should be within 15 Working Days of the end of each month.

**Question 19 - It is proposed that reporting should be per Distribution licence held per month. Do you agree with this proposal? If not, what alternative would you suggest?**

4.33 The majority of respondents to this question agreed that reporting should be per distribution licence area. The Working Group agreed with this approach, noting that Suppliers have the data available to them should they want additional information.

**Question 20 - Do you agree that the SLA reporting should state for each Distribution licence held per month whether or not the SLA was met? If not, what alternative would you suggest?**

4.34 Based on the consultation responses received, the Working Group agreed that performance against the SLAs should be expressed in percentage terms.

**Question 21 - Should the SLAs be reported by DNOs, Suppliers or both?**

4.35 Responses to this question were mixed, with a slight majority expressing a preference for both DNOs and Suppliers to report on performance against the SLAs.

4.36 The Working Group discussed the responses and agreed that that performance against the SLAs should be reported by Distributors only. It was suggested that reporting on performance in terms of misreporting Category A, B and C incidents should be completed by Suppliers, however,

at a later Working Group meeting it was concluded that this information should be reported by Distributors. In the final proposed legal text, Suppliers are responsible for reporting on forecasted rollout volumes.

**Question 22 - The Working Group proposes that the following is reported each month:**

- **The percentage of category A incidents that were incorrectly reported**
- **The percentage of category B incidents that were incorrectly reported**
- **The percentage of category C incidents that were incorrectly reported**

**Do you agree? Please provide your rationale.**

4.37 The majority of respondents agreed with the proposed reporting for incidents which are not the category reported by the Meter Operator. It was noted that the category will be determined by the Meter Operator based on their assessment of the situation. If the Distributor disagrees with the assessment then feedback to the Supplier will help to reduce the level of mis-reporting.

**Question 23 - Distributors: How soon would you be able to meet the SLAs for the work to done?**

4.38 The DNO respondents to this question all highlighted the need for more information on Supplier smart meter installation volumes. It was also noted that the RIIO-ED1 price control review is at an early stage, thus funding for the recruitment and training of additional Distributor staff has yet to be determined.

4.39 The Working Group noted that with these uncertainties the general consensus is that there is not enough information available for Distributors to provide a view on this.

**Question 24 - Distributors: How soon would you be able to meet the reporting requirements (e.g. implementation of systems to record required data)?**

4.40 The Working Group noted that, similar to question 23, the general consensus with regards to this question is that there is not currently enough information available to provide a view on this.

**Question 25 - If changes to implement reporting could delay the implementation of the SLAs, would you be supportive of different implementation dates?**

4.41 It was noted that the majority of respondents to this question do not believe that the SLAs should be delayed to allow for the implementation of reporting systems.

**Question 26 - It is the view of the Working group that the environmental impact associated with DCP 153 is negligible. The roll out of smart meters is mandated, therefore, the introduction of SLAs will not change whether or not premises need to be visited to exchange meters. The SLAs may have a slight impact on timescales but the environmental impact is negligible. Do you agree?**

4.42 After reviewing the consultation responses, the Working Group agreed that the environmental impact of DCP 153 is negligible.

**Question 27 - Do you have any further comments?**

4.43 Ten consultation respondents provided additional comments.

4.44 One Supplier respondent highlighted the need for dedicated contacts within each Distribution company that Suppliers can contact if necessary, for instance, if a customer raises a query or complaint with the Supplier. Another respondent highlighted the need to be able to deliver a consistent service to the customer across both gas and electricity. The Working Group agreed that both these points were outside the scope of DCP 153.

4.45 One respondent suggested that it may be appropriate to have a specific template of how each distributor would report the SLA data. The Working Group agreed that a template should be incorporated into the legal text to ensure consistency in the reporting.

4.46 Another respondent suggested that the group should establish some performance metric targets whereby the achievement of which means compliance with the SLA, for example achieving 80 or 90% performance for category B work within the SLA should be treated as compliance because hitting 100% may not be possible or at least not an appropriate/cost effective use of resources. However achieving a 100% performance for Category A safety issues may indeed be appropriate. The

Working Group agreed that such an approach was reasonable.

4.47 A respondent queried how, if DCP 127 'Gas First Smart Meter Installation' is approved, will gas meter installers notify Distributors of issues associated with the Distributor's assets and will these be subject to the same SLAs? The Working Group noted that email would need to be used for Category B instances or the installer could go back to the gas Supplier. Category A instances would be reported by telephone. It was noted that electricity distribution network issues notified by gas operatives would not be subject to the SLAs.

4.48 A respondent queried whether there were any penalties that may be imposed on Distributors for breach of the SLA conditions. It was noted that this would be a breach of the DCUSA obligations.

4.49 One respondent suggested that distributors should be able to charge abortive visit fees for any faults that are reported as a higher category than is actually the case. The group agreed that this may be reasonable and noted that charging for abortive jobs had been discussed in the Ofgem Strategy Consultation for RII0-ED1 document, which was published on 28 September 2012. This document is available here:

<http://www.ofgem.gov.uk/Pages/MoreInformation.aspx?docid=36&refer=Networks/ElecDist/PriceCntrls/riio-ed1/consultations>

## **5 WORKING GROUP ASSESSMENT OF DCP 153 FOLLOWING CONSULTATION ONE**

5.1 After reviewing the responses to the first DCP 153 consultation, the Working Group discussed the SLAs in light of the consultation responses received. The group agreed that there should be an SLA on the DNO to schedule a visit date and inform the Supplier of this visit date within ten working days of being notified of a Category B situation. It was also agreed in principle that the work should be completed within 40 working days of receiving the notification flow.

5.2 The Working Group agreed that it would be unreasonable to expect 100% of jobs to be completed within 40 Working Days. It was decided that a value of 90% should be proposed initially.

- 5.3 It was also agreed that it would be sensible to link the SLAs to smart meter roll out forecasts. If the actual roll out volumes were above the forecasted volume by a set amount, the SLAs would not apply. It was noted that in these circumstances, the SLAs would still need to be reported, but below target performance would not be deemed a failure.
- 5.4 The Working Group developed a straw man document setting out the proposed legal drafting amendments to the DCUSA based on its discussions. This straw man document was then issued for industry consultation.

## **6 DCP 153 – CONSULTATION TWO**

- 6.1 The second DCP 153 consultation was issued on 23 January 2013. The consultation was circulated to DCUSA Parties, the Association of Meter Operators Consumer Focus and Ofgem.
- 6.2 The consultation document, which is provided as Appendix E, sought market participant's views on the straw man DCP 153 legal drafting developed by the Working Group. Thirteen responses to the consultation were received.
- 6.3 A summary of the responses received, and the Working Group's conclusions are set out below. The full set of responses and the Working Group's comments are provided in Appendix E.

### **Question 1 - Do you have any comments on the definitions provided in the straw man document?**

- 6.4 The Working Group noted that there were several comments on the definitions in the straw man document. After discussing the comments the Working Group agreed to:
- Amend the definition for "Working Hours" such that it refers to the Electricity (Standards of Performance) Regulations 2010; and
  - Extend the definition of Category B and C Situations from includes "prevents a meter from being exchanged" to "prevents metering work from being carried out".

### **Question 2 - Do you agree with the proposal that Distributors should use reasonable endeavours to meet the SLAs on 90% of occasions in each calendar month?**

- 6.5 The Working Group noted that the majority of respondents agreed with the proposed 90%. It was also noted that this value is consistent with other industry standards. Without any evidence to support a move to an alternative value, the Working Group agreed that this value should remain as it is at present. It was noted that the value could potentially be reviewed at a later date once more data is available.
- 6.6 Two Supplier respondents highlighted their concern that incidents that are not resolved within the SLA period have the potential to be "lost" or carried forward indefinitely. The Working Group discussed this comment and agreed that the legal text should be updated to specify that such incidents should take priority for resolution in the next period.
- 6.7 One respondent queried how Category A situations are reported back to Suppliers and Meter Operators. The Working Group noted that Distributors should issue a D0126 flow for all Category A situations. It was noted that there is an obligation to send the flows correctly; however, as the updated D0135 and D0126 flows are newly introduced there may be a learning process to get the flows into a smooth state.
- 6.8 Two respondents suggested that the Category A SLA should be 100%. The Working Group discussed this comment and noted that the SLA is to attend the site and make the situation safe; a return visit may be needed to rectify the issue fully. It was further noted that there are safety requirements placed on DNOs outside of the DCUSA, for example, in the Guaranteed Standards and the Electricity Safety, Quality and Continuity Regulations (ESQCR) 2002.
- 6.9 One Supplier noted that they had received no D0126 responses to any Category A jobs they had sent since the introduction of the new flows.

**Question 3 - Do you agree with the proposal that if the average monthly volumes of meter installations across all Suppliers exceed Suppliers' forecast volumes by a certain percentage then the Distributors would be released from their obligation to meet the SLAs for that month?**

- 6.10 The majority of respondents agreed with the proposal to link the SLAs to Suppliers' smart meter roll out forecasts. The Working Group noted that Distributor resource levels will be significantly driven by Suppliers roll out forecasts, therefore, their ability to meet the SLAs will be highly dependent

on the information provided by Suppliers.

- 6.11 Several respondents highlighted their concerns that the poor forecasting performance of some Suppliers could negatively impact all other Suppliers. The Working Group discussed this point and noted that this issue is difficult to resolve as the forecasts are being pooled together. It was suggested that the requirement to meet the SLAs could be released on a per Supplier basis. However, the Working Group noted that Distributors do not manage jobs on a per Supplier basis and using this approach would be impracticable.
- 6.12 The Working Group noted that the situation may not arise in practice. It was agreed that no action should be taken at present and if this is found to be an issue in the future then it can be addressed at this point.
- 6.13 One respondent stated that they totally disagreed with linking the SLAs to smart meter roll out forecasts. It was the respondent's view that the network issues are unrelated to the smart roll out and it is irrelevant whether or not the issue is identified as part of a smart meter installation. The Working Group discussed this comment and agreed that it is sensible to link the SLAs to roll out volumes as this is the key driver behind the identification of network issues. It was noted that the DCP 153 legal text does not prevent the SLAs from applying to day to day issues too.
- 6.14 After discussing each of the consultation responses to question 3, the Working Group agreed that if the average monthly volumes of meter installations across all Suppliers exceed Suppliers' forecast volumes by a certain percentage then the Distributors should be released from their obligation to meet the SLAs for that month.

**Question 4 - Should this percentage be set at 15%?**

- 6.15 The Working Group noted that there was a mixed response to this question, as shown in the following table:

Respondent Type	Count of Respondents			
	Yes	No	Undecided	Total
<b>DNO</b>	2	3	1	<b>6</b>
<b>IDNO</b>	1	0	0	<b>1</b>
<b>Supplier</b>	3	2	1	<b>6</b>
<b>Total</b>	<b>6</b>	<b>5</b>	<b>2</b>	<b>13</b>

- 6.16 Three respondents queried how the 15% value had been derived. The Working Group noted that the value was based on the guaranteed standards for un-metered connections and, therefore, is consistent with other industry standards.
- 6.17 Those DNOs that disagreed with the proposed 15% value suggested that it should be lower. One Supplier suggested that the value should be higher and another suggested that there should not be a percentage.
- 6.18 The Working Group discussed the consultation responses and agreed that there is not sufficient justification to move away from the 15%. It was noted that, similar to other values in the legal text, this is a starting point which can be reviewed at a later date.

**Question 5 - The Working Group does not believe that the forecasting in its current format will work for IDNOs. Do you have any views on how the Supplier Volume forecasting for IDNOs should work?**

- 6.19 The only IDNO to respond to the consultation noted their agreement that the Supplier forecasting does not work for IDNOs in its current format, however, they noted that they did not have any suggestions in regards to how this could be addressed. The respondent stated that in their view there may be less impact on IDNOs and therefore the lack of forecasting data may not be an issue.
- 6.20 Three Supplier respondents suggested that IDNO networks are relatively new and therefore the number of Category A, B and C incidents should be lower. As a result, these respondents did not believe that roll out forecasts by IDNO Party were necessary.
- 6.21 One respondent suggested that the IDNO could be released from its obligation in respect of its networks within a GSP Group if the volume of meter installations in the GSP Group is exceeded by the set percentage. In other words, if the host DNO is released from the obligation, IDNOs are also released in respect of their networks within that DNO's area. The Working Group agreed that this was a sensible approach and agreed to update the DCP 153 legal text accordingly.

**Question 6 - Do you agree that the D0126 flow issued once a situation has been remedied should contain the Distributor's view of the correct asset condition code, particularly if different from the code reported in**

**the D0135?**

- 6.22 Ten respondents to this question agreed with the proposal.
- 6.23 One respondent disagreed, as in their view the D0126 flow is not the correct vehicle.
- 6.24 The remaining two respondents noted that it is more important that a situation has been reported as the right category, rather than code. These respondents highlighted that the mis-reporting of codes within the same category is not a material issue relative to the mis-reporting of the category. The Working Group discussed this point and agreed that the DCP 153 legal text should be updated to say "category" rather than "code".
- 6.25 The Working Group agreed that guidance should be provided through the Master Registration Agreement (MRA) and Meter Operation Code of Practice Agreement (MOCOPA) on how to use the data flows such that the 'asset condition code' field in the D0126 is used to report the code that Distributor believes it should have been.
- 6.26 The Working Group noted that if there are multiple faults at a customer's premises then only one will be reported in the D0135 data flow. The group discussed whether this would be an issue for Distributors, and it was agreed that the Distributor staff attending should have the skills required to deal with multiple faults; however, time constraints may be an issue if the staff member attending has other jobs scheduled as only one fault was expected.
- 6.27 The Working Group noted that the MOCOPA guidance document states that the issue that is most important should be reported in the data flow. The Working Group liaised with the MOCOPA to ensure that the guidance document also specifies that additional fault codes should be included in the free text field of the D0135.

**Question 7 - Should there be specific clauses in the DCUSA that defines how the process for notifying the Supplier where an SLA cannot be met will work, or would it be preferable to include this information in a guidance document?**

- 6.28 As demonstrated in the table below, the majority preference across respondents was for the information to be provided in a guidance document.

Respondent Type	Count of Respondents					
	DCUSA	Guidance Document	Either	Neither	Undecided	Total
<b>DNO</b>	0	2	2	1	1	<b>6</b>
<b>IDNO</b>	0	1	0	0	0	<b>1</b>
<b>Supplier</b>	2	3	1	0	0	<b>6</b>
<b>Total</b>	<b>2</b>	<b>6</b>	<b>3</b>	<b>1</b>	<b>1</b>	<b>13</b>

6.29 The Working Group discussed the scenario where the Distributor knows that an SLA will not be met. It was noted that where a perceived distribution fault has been passed to the Distributor, the Supplier knows that the SLA is that the work should be completed within 40 Working Days. If no information is received from the Distributor then the Supplier will not know if the job has been completed or whether an appointment has been made. In these circumstances Suppliers would need to chase up the Distributor.

6.30 It was highlighted that if the Distributor gives the Supplier the information then the Supplier will not need to chase up. In addition, the Supplier can proactively call the customer to tell them that the DNO appointment has been delayed, which will improve the customer experience.

6.31 Based on the consultation responses received, Working Group agreed that a specific process for notifying the Supplier where the Distributor knows that an SLA cannot be met should not be defined within the DCUSA. However, it was agreed that the DCUSA should place a requirement on Distributors to notify the Supplier in advance where the Distributor is aware that it will not be able to attend a customer agreed appointment.

**Question 8 - If specific clauses are to be included in the DCUSA where an SLA cannot be met, which data flow should be used to inform the Supplier that the SLA cannot be met and notify them of when an appropriate person will be sent to resolve the situation?**

6.32 Two respondents to this question noted that in their view there should not be a requirement on Distributors to notify the Supplier where the SLA cannot be met. Four respondents were unsure of which flow would be most appropriate.

6.33 The remaining respondents suggested several different data flows; namely the D0001<sup>4</sup>, D0002<sup>5</sup>, D0126<sup>6</sup>, D0135<sup>7</sup> or D0167<sup>8</sup> the creation of a new flow.

---

<sup>4</sup> D0001 - Request Metering System Investigation

However, there was no majority consensus on which flow would be most appropriate.

- 6.34 One respondent believed there should be a financial penalty on DNOs for failure in their obligations or misreporting similar to that proposed for Suppliers.
- 6.35 The DCP 153 Working Group discussed the responses received. It was decided that the best place group to provide an answer to this question would be the MRA Issue Resolution Expert Group (IREG). The Working Group has, therefore, raised this issue with the IREG for resolution.

**Question 9 - Do you agree that the Distributor report should be produced within 15 Working Days of the end of each calendar month?**

- 6.36 All respondents but one agreed with the proposal that the Distributor report should be produced within 15 Working Days of the end of each calendar month.
- 6.37 The respondent that did not agree suggested that reporting should be three months in arrears. The basis for this suggestion is that it would not be known if a Category B situation which was reported on the last day of the month had failed the service level until 40 working days later, hence the need for the reports to be three months in arrears.
- 6.38 The Working Group discussed this comment and noted that an action can only be reported once it is complete, i.e. the reporting is based on the jobs completed within the reporting month. If the report were to be issued two months later than proposed, there would be no difference in the report itself, it would just be issued later.
- 6.39 Another respondent, which agreed with the proposed 15 working days, highlighted the need to ensure that all Distributors report their performance on a consistent basis. The respondent suggested that the wording of the DCP 153 legal text may not be robust enough which could leave it open to interpretation.
- 6.40 The Working Group discussed this comment and reviewed the legal text to

---

<sup>5</sup> D0002 - Fault Resolution Report or Request for Decision on Further Action

<sup>6</sup> D0126 - Asset Condition Report Response / Clearance

<sup>7</sup> D0135 - Asset Condition Report

<sup>8</sup> D0167 - Response to Distribution System Enquiry

ensure that it is robust.

**Question 10 - Do you agree that Suppliers should report on their smart metering roll out plans by the last Working Day of December, March, June and September in each year up to and including 2019?**

6.41 As demonstrated in the table below, the majority of respondents supported this proposal.

Respondent Type	Count of Respondents				
	Yes	No	Align with DECC Reporting	No Comment	Total
<b>DNO</b>	6	0	0	0	<b>6</b>
<b>IDNO</b>	0	0	0	1	<b>1</b>
<b>Supplier</b>	2	2	2	0	<b>6</b>
<b>Total</b>	<b>8</b>	<b>2</b>	<b>2</b>	<b>1</b>	<b>13</b>

6.42 Two respondents disagreed, suggesting that the reporting information required by the Department of Energy and Climate Change (DECC) should be sufficient and that no additional obligations should be incorporated into DCUSA.

6.43 Two other respondents suggested that the DCUSA Supplier reporting should be aligned with the DECC reporting requirements to minimise the additional costs to Suppliers. The Working Group noted this point and agreed that aligning the DCUSA Supplier smart meter roll plan dates with the DECC dates would be beneficial.

6.44 One of the respondents suggested that both forecast and actual smart meter installations should be reported on by Suppliers. The Working Group noted that across the consultation several respondents had requested actual volumes from Suppliers. It was agreed that the DCP 153 legal text should be amended accordingly.

**Question 11 - Do you agree that the Supplier reports should not be published on the DCUSA website but rather emailed directly to distributors by the DCUSA Secretariat?**

6.45 As shown in the table below, the majority of respondents agreed that the Supplier reports should not be published on the DCUSA website.

Respondent Type	Count of Respondents			
	Do Not Publish	Do Publish	No Preference	Total
DNO	3	2	1	6
IDNO	0	0	1	1
Supplier	6	0	0	6
Total	9	2	2	13

- 6.46 Several of the respondents that agreed that the reports should not be published highlighted that the reports are commercially sensitive.
- 6.47 Of the two respondents that supported publishing the reports, one suggested that the files may be too large to be sent by email and suggested that they be published on a private location on the DCUSA website with all users agreeing to a confidentiality agreement regarding the use of the data. The other respondent suggested that there should be a central repository containing all the reports which are accessible by all interested parties.
- 6.48 The Working Group discussed the distribution of the Supplier reports. It was highlighted that Distributors are in a monopoly position whilst Suppliers are in competition, thus, the argument for different reporting rules. In line with the majority view of respondents, the Working Group agreed that Supplier reporting information should not be published on the DCUSA website.

**Question 12 - Should the report be published on the private section (where it will only be visible to registered users) or the public section of the DCUSA website?**

- 6.49 Only one respondent to this question supported publishing the Supplier roll out forecasting report on the public section of the DCUSA website. Five respondents agreed that the report should be on the private section of the website and another five stated that in their view it should not be published on either the public or the private section. The remaining two respondents had no preference.
- 6.50 The DCP 153 Working Group noted that after reviewing the responses to question 11 it had been agreed that reports should not be published.

**Question 13 - Do you agree with the proposal that Distributors should be entitled to levy charges where a certain percentage or above of situation are reported by the Supplier, or its Meter Operator Agent, within the company's service area as a higher Category than is the**

**case?**

6.51 The table below provides a breakdown of the responses to this question by Party type. It can be seen that the majority of respondents support the proposal.

<b>Respondent Type</b>	<b>Count of Respondents</b>		
	<b>Support Charges</b>	<b>Do Not Support Charges</b>	<b>Total</b>
<b>DNO</b>	6	0	<b>6</b>
<b>IDNO</b>	1	0	<b>1</b>
<b>Supplier</b>	4	2	<b>6</b>
<b>Total</b>	<b>10</b>	<b>3</b>	<b>13</b>

6.52 Those that supported introducing an entitlement on Distributors to levy charges suggested that it is right that Suppliers that cause unnecessary costs for Distributors should be charged these costs. Several of these respondents suggested that there should, however, be a bedding in period before any charges are levied. This period would allow the industry to develop guidance and train staff to ensure that asset condition categories are correctly reported.

6.53 One of the respondents that did not support introducing an entitled to levy charges suggested that it was inappropriate as DCUSA does not contain any current charging arrangements. The Working Group discussed this comment and noted that DCUSA contains nearly all the existing charging arrangements between Suppliers and Distributors.

6.54 Another respondent suggested that training issues should be highlighted and addressed, rather than charges levied. The Working Group noted that Distributors need to ensure that they can operate efficiently and recover unnecessary costs. The group agreed that it would not be fair on Suppliers that were performing well if Distributors could not recover unnecessary costs from the Suppliers responsible for generating them. In addition, the levying of charges will incentivise improved performance, thus improving efficiency and reducing Distributor costs.

6.55 One respondent that agreed with the proposal but cautioned that it may turn into a time consuming exercise. A further two the respondents cautioned that care must be taken not to encourage a culture where meter operatives are deterred from reporting potential safety issues for fear of financial penalty.

6.56 The Working Group discussed whether there should be a reciprocal arrangement where the Supplier can levy a charge where the Distributor fails to attend a customer agreed appointment or where the Distributor had classified the job incorrectly. It was noted that the Distributor would be required to reimburse the customer through the Guaranteed Standards in these circumstances, but this didn't cover the excess costs incurred by Suppliers

**Question 14 - Should this percentage be set at 15%?**

6.57 The majority of respondents to this question disagreed with setting the percent of incorrectly categorised situations above which Distributors could levy a charge at 15%. The following table provides a breakdown of the responses.

Respondent Type	Count of Respondents			
	Agree with 15%	Disagree	More info needed	Total
DNO	1	4	1	6
IDNO	0	1	0	1
Supplier	3	2	1	6
<b>Total</b>	<b>4</b>	<b>7</b>	<b>2</b>	<b>13</b>

6.58 Two respondents suggested that further information was needed to support the 15% figure. For instance, what will the smart meter roll out volumes likely to be.

6.59 The two Supplier respondents that disagreed with the 15% figure noted that they did not support the introduction of any charges relating to the reporting of the asset condition categories.

6.60 The four DNO respondents that disagreed suggested alternative percentages ranging from 0% to 2%.

6.61 The Working Group agreed that there was not sufficient justification to move away from this value at present. It was agreed that this should be reviewed post implementation as more data on the smart roll out and rate of network issues will be available by this point.

**Question 15 - Are there any other scenarios which should also incur charges (for example, aborted visits)?**

6.62 Two respondents noted that they did not believe that there were any other

scenarios that should incur charges. A further two respondents stated that in their view no charges should be incurred, including where situations are reported by the Supplier, or its Meter Operator Agent, as a higher Category than is the case.

6.63 There were three suggested scenarios where the DNO would be liable for charges, as follows.

- The Supplier should be compensated by the DNO for breaking an appointment;
- The Supplier should have the ability to charge if the MOP has attended at the same time as the Distributor and the distributor cannot complete the job. For example, if the staff are not correctly skilled, the correct equipment is not brought or the Distributor runs out of time; and
- Costs incurred by the Supplier who has attended after receiving confirmation that the intervention has occurred and finds that there is still an issue on site.

6.64 There were three scenarios suggested where the Supplier would be liable for charges:

- As discussed under a previous consultation question, the ability to levy a charge where a network issue is mis-categorisation. This would include instances where no fault was present;
- Abortive visits where the customer has agreed an appointment but not kept it, as Distributors do not necessarily have the functionality to charge customers directly; and
- Where a Distributor is called out to a fault at a premise within a defined period of time following the installation of a smart meter and the fault is within the meter or as a consequence of the meter installation.

6.65 It was also suggested that there could be DNO to customer payments, similar to Guaranteed Standards payments, where the DNO has delayed the customer's change of meter due to problems with their network.

6.66 The Working Group discussed each of the responses to this question and

agreed that at present no changes should be made to the DCP 153 legal text. The group agreed that this area should be considered further under the post implementation review.

**Question 16 - The majority of respondents to the previous DCP 153 consultation agreed that it is reasonable that category B visits should be scheduled within 10 days of receipt of the D0135 flow. Do you still feel that this is reasonable?**

- 6.67 Eleven of the thirteen respondents agreed that it is reasonable that Category B visits should be scheduled within 10 days of receipt of the D0135 flow.
- 6.68 One respondent suggested that the period should be 10 working days rather than 10 days. The Working Group noted that they had previously agreed the principle that it should be ten working days and this is what had been included in the straw man legal text issued with the consultation.
- 6.69 Another respondent disagreed with there being an SLA around the scheduling of appointments. The respondent noted that in their view the SLAs should focus on the resolution of the defect only. The respondent highlighted that the Distributor would not know how complicated or time consuming the defect is to resolve until it has examined the defective equipment. For this reason most would want to arrange appointments and visit the Customer well within the permissible turnaround time as a matter of course.
- 6.70 The Working Group discussed this response and noted that having a 10 working day requirement would enable the Supplier to give the customer a view of when they will be contacted by the Distributor. It was agreed that this would be important in enhancing the customer experience.

**Question 17 - It is proposed that where a Distributor has made reasonable endeavours to agree an appointment with a connectee for a Category B Situation and has been unable to secure one then the Distributor will have been deemed to have met the service level. Do you agree that a call to the connectee during working hours on a working day and a call outside working hours and a letter should be considered**

**reasonable endeavours? (Note, Working Hours would be as defined in the definitions section of the Straw man document, i.e. the period between 7.00 am and 7.00 pm on each Working Day and 9.00 am and 5.00 pm on any other day).**

- 6.71 Ten of the thirteen respondents agreed that a call to the connectee during working hours on a working day and a call outside working hours and a letter should be considered reasonable endeavours.
- 6.72 Of those that disagreed, one highlighted that they do not have staff in place to contact customers outside of working hours. Another suggested that there should be three calls, two letters and a home visit.
- 6.73 Another respondent disagreed on the basis that the reasonable endeavours requirement should apply to both Category A and Category B instances.
- 6.74 Two distributor respondents highlighted the importance of the MOP providing contact details for the customer. The Working Group noted that the MOCOPA guidance document will cover providing the correct contact information.

**Question 18 - Do you have any further comments on the Network SLAs as defined in the straw man document?**

- 6.75 Four respondents had additional comments on the network SLAs.
- 6.76 One respondent suggested that there should be a requirement on the DNO to provide an incident reference number for every Category A issue to the operative making the call, at the time of that call. The Working Group noted that the provision of contact details is covered in the MOCOPA guidance document. It was also highlighted that the reference number may just be the MPAN number.
- 6.77 One respondent suggested that simplification of the report parameters may aid end users in complying with their reporting requirements. The Working Group noted the respondents' concerns around the reporting.
- 6.78 Another respondent queried whether for Category A incidents the Distributor will make the site safe outside of working hours. The Working Group noted that this is not a common event.
- 6.79 Another respondent highlighted that the straw man document does not

state what should happen in the case of a Category B situation where customer contact details have not been provided in the data flow. The Working Group noted that the contact details are in a non-compulsory field in the D0135 flow and therefore the flow cannot be rejected if they are not received, however, the address will always be received as it is compulsory. It was suggested that if Distributor is receiving poor information from a particular Supplier then they contact that Supplier directly.

**Question 19 - The Working Group proposes to liaise with the MRA to determine how the arrangements can be amended to allow the valid set of Asset Condition Codes to be documented within the DCUSA rather than the MRA Do you agree with this approach?**

6.80 As shown in the table below a slight majority of respondents agreed with the proposal to liaise with the MRA to determine how the valid set of asset condition codes can be brought within the DCUSA.

Respondent Type	Count of Respondents			
	Agree	Disagree	No Preference	Total
<b>DNO</b>	2	2	2	<b>6</b>
<b>IDNO</b>	0	1	0	<b>1</b>
<b>Supplier</b>	4	2	0	<b>6</b>
<b>Total</b>	<b>6</b>	<b>5</b>	<b>2</b>	<b>13</b>

6.81 Those in support of the proposal highlighted that it would prevent SLA performance from being affected by changes in a set of codes outside DCUSA governance. Those who did not support the proposal suggested it is not necessary to move the valid set as sufficient information is shared across the industry codes to ensure that any impact on the DCUSA SLAs would be identified during the MRA change process.

6.82 The Working Group agreed to proceed with the majority view and liaise with the MRA.

**Question 20 - Do you believe that Distributors should report at an industry level or Supplier level?**

6.83 As demonstrated by the table below responses to this question were varied.

Respondent Type	Count of Respondents			
	Industry	Supplier	Both	No

	Level	Level		Preference	
<b>DNO</b>	3	1	2	0	<b>6</b>
<b>IDNO</b>	0	0	0	1	<b>1</b>
<b>Supplier</b>	2	1	3	0	<b>6</b>
<b>Total</b>	<b>5</b>	<b>4</b>	<b>5</b>	<b>1</b>	<b>13</b>

6.84 The Working Group discussed the responses received and agreed that reporting should be at an industry level.

**Question 21 - Reporting item (p)<sup>9</sup> in the straw man document proposes that Distributors should report the number of times that they have gone out to a distribution fault at a Premises within a month of a smart meter being installed at the Premises and the fault is with the meter or the meter installation. Do you agree that the SLA reporting should include reporting on failures post smart metering installation?**

6.85 Nine consultation respondents agreed that the SLA reporting should include reporting on failures post smart metering installation. The remaining four respondents disagreed.

6.86 Of the respondents that agreed with the proposal, two suggested that the time period should be greater than one month.

6.87 Of the respondents that disagreed the suggested that this type of reporting was outside of the scope of DCP 153. The Working Group discussed this suggestion and agreed that such reporting will promote a feedback loop which will ensure quality issues are fed back to the Supplier, thus reducing issues over time.

6.88 One respondent suggested that Distributors would not know when the smart meter had been installed. The Working Group noted that there will be a label on the smart meter saying when it was installed and the information would also be included in the D0150 flow.

6.89 One respondent thought this could be useful to highlight deficiencies in the DNOs screening process for network faults if they are attending meter faults instead of network faults.

**Question 22 - Do you have any further comments on the Distributor reporting requirements as defined in the straw man document?**

---

<sup>9</sup> It should be noted that following the close of the consultation and subsequent updates to the DCP 153 legal text, reporting item (p) is now shown in the final DCP 153 legal text as reporting item (q).

- 6.90 One respondent suggested that there should be additional reporting that details those incidents that are not resolved within the SLAs but are resolved within the following period. The Working Group noted that, as discussed against question 2, it had been agreed that the DCP 153 legal text should be updated to specify that such incidents should take priority for resolution in the next period. It was agreed that additional reporting on these incidents was not necessary.
- 6.91 A Supplier respondent stated that they would see value in a report that shows performance where Distributors are unable to arrange appointments with customers as a percentage of total Category B jobs raised by the Supplier or its Agent. The Working Group noted that the Distributor will be required to tell the Supplier where they have failed to make an appointment; therefore, this information is available to the Supplier.
- 6.92 Another respondent highlighted that they do not agree with the requirement to report Category B situation appointments and believe that the incorrect categorisation reporting requirements are excessive. The respondent suggested that the reporting should focus only on the end goal of resolving the issue so that the meter exchange can take place.

**Question 23 - Do you have any comments on the Supplier reporting requirements as defined in the straw man document?**

- 6.93 A supplier respondent noted that they have no current plans to report smart meter roll out forecasts by postcode out code. Another Supplier respondent reiterated their view that the SLAs should not be linked to forecasted smart meter installations as the faults on the network are pre-existing.
- 6.94 A Distributor respondent suggested that it would be preferable if more detailed information was provided in the Supplier reports and suggested that the level of detail proposed will not offer the best opportunities for Distributors to work in connection with Suppliers.
- 6.95 Another Distributor respondent suggested some amendments to the legal text which would provide greater clarity. The Working Group agreed to update the legal text accordingly.

**Question 24 - Are there any percentage values or timescales in the straw man document that you do not support? If yes, please provide an alternative value and your reasoning.**

6.96 The Working Group noted that all percentage values and timescales mentioned had been discussed against earlier consultation questions.

**Question 25 - Do you believe that DCP 153 should introduce any reporting requirements in relation to Category C situations?**

6.97 Ten of the thirteen respondents agreed that reporting requirements should not be introduced for Category C situations.

6.98 Two respondents suggested that a high level count of Category C instances would be useful. Another respondent suggested that Distributors should be required to report on the age profile of Category C situations that they have been notified of, showing how many of the situations that have been reported to them are outstanding within specific time bands. Another respondent stated that reporting the total number of Category C situations could measure the added free benefit the DNOs are receiving from the roll out of smart meters in the way of an audit of their assets. This may be of use in the future when setting levels of income needed under the price control.

**26. Do you believe that the Working Group should pursue a centralised reporting line of enquiry on performance against the SLAs or should reporting on performance against the SLAs be the responsibility of individual market participants?**

6.99 As shown in the table below the majority of respondents are in favour of individual reporting.

Respondent Type	Count of Respondents			
	Centralised Reporting	Individual Reporting	No Preference	Total
<b>DNO</b>	1	4	1	<b>6</b>
<b>IDNO</b>	1	0	0	<b>1</b>
<b>Supplier</b>	2	3	1	<b>6</b>
<b>Total</b>	<b>4</b>	<b>7</b>	<b>2</b>	<b>13</b>

6.100 Having reviewed the consultation responses the Working Group agreed that centralised reporting should not be pursued.

**Question 27 - Do you have any further comments?**

6.101 One Supplier respondent suggested that without the swift implementation of these SLAs they are not convinced that all Distributors will act upon the

network issues notified to them and will thereby hold up the efficient roll out of Smart metering. The respondent stated that they believe the SLAs should be implemented without further delay and reporting can follow at a later date.

- 6.102 Another respondent highlighted that the wording of the legal text would not preclude a Supplier /MOP from accumulating defects for up to 10 days and submitting them in a block. The respondent suggested that an approach like this should be discouraged. The Working Group noted that staff for larger Suppliers will have hand held devices allowing them to send defect flows whilst still on site. For smaller Suppliers this may not be possible.
- 6.103 One respondent stated that the working group has produced a very comprehensive proposal and noted that they fully support the delivery of a Service Level Agreement framework through the DCUSA arrangements.

## **7 WORKING GROUP ASSESSMENT OF DCP 153 FOLLOWING CONSULTATION TWO**

- 7.1 After reviewing the consultation responses the Working Group updated the DCP 153 legal text in light of the comments received. The final version of the DCP 153 legal text is provided in Appendix B.
- 7.2 When updating the legal text, the group agreed to remove elements of the legal text that would require Parties to provide notification of appointment dates and subsequent updates, as there are not currently the data flows in place to fully facilitate the communication of this information. The Working Group agreed that it would be preferable to progress these elements under a separate CP once new flows were available. The creation of these new flows is being progressed with the IREG.
- 7.3 The Working Group discussed the implementation date for the Change Proposal. It was noted that several DCUSA Parties had expressed a preference for the change to be implemented sooner rather than later, even if the reporting systems could not feasibly be in place by the time that the SLAs were implemented.
- 7.4 The Working Group agreed that the implementation date of DCP 153 should be 7 November 2013.

- 7.5 The Working Group notes that by 7 November 2013 Distributors may not be in a position to meet the SLAs themselves or the reporting requirements. It is the view of the Working Group that the implementation of DCP 153 will aid the industry in ramping up to the required resource levels by setting the benchmark to which to aim with regards to the resolution of network issues. It will also facilitate the sharing of information across the industry. Whilst this recognition does not remove DCUSA Parties obligation to adhere to the rules within the DCUSA, it is the view of the Working Group that Parties should not be unduly penalised during the 'bedding in' period of the CP.
- 7.6 The Working Group recognises that as more information on smart meter rollout becomes available it may be necessary to review the legal text introduced by DCP 153 to ensure that the percentage values and timescales remain fit for purpose. The Working Group therefore recommends that a post-implementation review be held approximately nine months after the implementation of DCP 153, i.e. in August 2014.

## **8 PROPOSED LEGAL TEXT**

- 8.1 The proposed legal drafting of DCP 153 has been considered by the Working Group, and reviewed by Wragge & Co, and is attached as Appendix B.
- 8.2 The legal text introduces new definitions to DCUSA Section 1A and amends the text in Clause 30.5. It also introduces a new schedule (Schedule 23) which defines the Network SLAs and associated reporting requirements.

## **9 EVALUATION AGAINST THE DCUSA OBJECTIVES**

- 9.1 The Working Group considers that the following DCUSA Objectives are better facilitated by DCP 153.

### **General Objective One – 'The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks'**

- 9.2 The Change Proposal better meets DCUSA General Objective One by ensuring that network issues reported to the network companies are rectified within agreed timescales therefore contributing to the efficiency of the network.

### **General Objective Two – 'The facilitation of effective competition in the generation and supply of electricity and (so far as is consistent**

**therewith) the promotion of such competition in the sale, distribution and purchase of electricity'**

- 9.3 The CP better meets General Objective Two as the proposal will help Suppliers in managing customer expectations with regard to fault resolution. This will assist those Suppliers who are carrying out meter exchanges to support specific customer propositions and therefore help to improve competition in the electricity supply market.

**General Objective Three – 'The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences'**

- 9.4 The CP better meets General Objective 3 as Licence Condition 21 "The Distribution Code" places obligations on licensees to ensure licencees operate their network in an efficient, co-ordinated and economical manner. The proposed changes will assist network owners in ensuring these obligations are met.

## **10 IMPLEMENTATION**

- 10.1 DCP 153 is classified as a Part 1 matter and therefore will go to the Authority for determination after the voting process has completed.
- 10.2 The Working Group recognises that there is uncertainty around the smart meter roll out volumes, making it difficult for Distributors to scope resource requirements needed to meet the SLAs. It is the unanimous view of the Working Group members that the implementation of the SLAs should not be delayed until such a point as more information is available. The Working Group is of the view that DCP 153 will help to define targets and facilitate the sharing of information between Suppliers and Distributors, thus aiding in resource discussions.
- 10.3 The proposed implementation date, subject to Authority approval, is 7 November 2013.

## **11 WORKING GROUP CONCLUSIONS**

- 11.1 The DCP 153 Working Group has discussed the proposed amendment to DCUSA at length and issued two consultations to aid them in developing the DCP 153 legal text. The group unanimously agrees that the legal text developed better facilitates the DCUSA Objectives. The Working Group agrees that the CP should be issued for industry voting.

11.2 In addition, subject to their implementation, the Working Group recommends that the legal amendments introduced by DCP 153 should be reviewed approximately six to nine months after implementation.

## **12 ENGAGEMENT WITH THE AUTHORITY**

12.1 Ofgem has been fully engaged throughout the development of DCP 153 as a member of the Working Group.

## **13 ENVIRONMENTAL IMPACT**

13.1 In accordance with DCUSA clause 11.14.6, the Working Group assessed whether there would be a material impact on greenhouse gas emissions if DCP153 were implemented. The Working Group did not identify any material impact on greenhouse gas emissions from the implementation of this Change Proposal.

## **14 PANEL RECOMMENDATION**

14.1 The Panel approved this Change Report on 17 July 2013. The Panel considered that the Working Group had carried out the level of analysis required to enable Parties to understand the impact of the proposed amendment and to vote on DCP 153.

14.2 The timetable for the progression of the Change Proposals is set out below:

<b>Activity</b>	<b>Date</b>
Change Report issued for voting	18 July 2013
Voting closes	8 August 2013
Change Declaration	5 August 2013
Authority Decision	11 September 2013
CP Implemented	7 November 2013
Post Implementation Review	7 August 2014

## **15 NEXT STEPS**

15.1 Parties are invited to consider the proposed amendment (Appendix B) and submit their votes using the Voting form (Appendix C) to [dcusa@electralink.co.uk](mailto:dcusa@electralink.co.uk) by **8 August 2013**.

15.2 If you have any questions about this paper or the DCUSA Change Process please contact the DCUSA by email to [dcusa@electralink.co.uk](mailto:dcusa@electralink.co.uk) or telephone 020 7432 2842.

**16 APPENDICES:**

- Appendix A – DCP 153 Change Proposal
- Appendix B – DCP 153 Proposed Legal Drafting
- Appendix C - DCP 153 Voting Form
- Appendix D – DCP 153 Consultation One Documents
- Appendix E - DCP 153 Consultation Two Documents