

DCUSA DCP 153 Consultation Responses – Collated Comments

Question One	1. Do you have any comments on the definitions provided in the straw man document?	Working Group Comments
British Gas	No comments on the definitions	Noted
EDF Energy	We only have a one comment on the definitions within the straw man document; we believe that the definition of a Category A situation should also make explicit reference to this situation preventing the meter from being exchanged.	<p>The Working Group discussed this comment and noted that a smart meter could potentially be installed whilst waiting for the DNO to arrive depending on the nature of the issue.</p> <p>It was agreed that no amendment should be made to the definitions in relation to this comment.</p>
EON Energy	No.	Noted
ENWL	None	Noted
GTC	No	Noted
Northern Powergrid	Northern Powergrid is comfortable that the definitions are clear.	Noted
npower	The definition of 'Working Hours' should not seek to redefine the Working Hours as already set out in Schedule 1 of the Electricity (Standards Of Performance) Regulations 2010. Simply referencing the relevant regulations should suffice.	<p>It was noted that if schedule 1 of the Electricity (Standards of Performance) Regulations 2010 changed it could cause difficulties. It was highlighted that generally the DCUSA makes references to other documents rather than re-stating them.</p> <p>It was agreed to redefine 'Working Hours' such that the definition refers to Schedule 1 part 2 of</p>

		the Electricity (Standards of Performance) Regulations 2010. Action
ScottishPower Energy Retail Ltd	No	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	We have no comments on the current definitions provided in the straw man document at this time.	Noted
SP Distribution SP Manweb	SPEN are happy with the definitions provided in the straw man.	Noted
SSE Energy Supply	The requirement for forward planning at the level of detail requested under 30.5A.2 is not achievable based on our roll out plan. For forward planning at the level of detail requested under 30.5A.2 is not achievable based on our roll out plan. 4.1B requests postcode outcode level which is a granular level that will be difficult to achieve. Any inbound customer contact would result in an attempt to secure an appointment to install smart meters if we have sufficient staff in that area. We may be able to provide regional data on our plans at a higher level to show volumes. Best endeavours will be to provide detail at as low a level as possible.	It was noted that during early roll out Suppliers may take all opportunities to organise a meter exchange visit. This will make forecasting by post code difficult. The group agreed to review this area further under the reporting questions later in the consultation.
UKPN	The descriptions are fine in principle. Category A – it is unclear what the last sentence adds. Category B – does it need to make it clear that the situation is one which would prevent a meter operator working in accordance with good industry practice from changing the meter	The group discussed the respondent's comments and agreed that the Category A description should not be amended as the last sentence provides additional clarification. It was noted that the MOCOPA guidance

	<p>– to avoid the DNO being called out due to low skill or policy issues for MOPs (e.g. some MOPs avoid working on certain situations that we have approved them working on)?</p> <p>Category C – needs “means” at the front</p>	<p>document and the re-training process for staff should reduce skill and policy issues. The importance of making sure that the industry is aware of the publication of this guidance document was noted.</p> <p>It was agreed that the Category C definition should be updated to include ‘means’ at the front. Action</p>
Western Power Distribution	<p>The definition of Category B & C situations includes “prevents a meter from being exchanged”. This is a too narrow remit given that the SLAs are to endure beyond the smart meter roll out. WPD suggests it is re-phrased as “prevents metering work from being carried out”.</p> <p>The definition of a Category C situation mixes up a description of the symptoms with the course of action to be taken upon discovery. WPD suggests it is re-phrased as “means a situation where a distributor’s equipment is impaired in some way but which is not a Category A Situation or a Category B Situation and does not prevent metering work from being carried out.”</p> <p>Working Hours should mean the period between 7am and 7pm on each Working Day only. There is something illogical about there being “working hours” on a “non-working day”.</p>	<p>The Working Group discussed this response and agreed to update the straw man document definition of Category B and C situations accordingly. It was noted that this change should be fed through to the MOCOPA document. Action</p> <p>It was noted that the Working Group had previously agreed that Category C situations are not defects but rather a ‘report’ for information. It was agreed that no change should be made to the Category C definition.</p> <p>It was noted that the Working Hours definition is taken from the Electricity (Standards of Performance) Regulations 2010.</p>
Question Two	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? Please provide supporting comments.	Working Group Comments
British Gas	Currently there are no SLAs in place for Distributors when attending incidents on their network. Therefore we believe that	Noted

	the SLA should be set at 90% initially and then reviewed in the light of operational experience and once smart meter roll out is fully underway.	
EDF Energy	<p>While we recognise that meeting the SLAs in 100% of situations may not always be possible, we believe that the following consideration need to be made in regards to this proposal:</p> <ul style="list-style-type: none"> • We do not believe that “reasonable endeavours” are sufficient in the case of Category A situations given the nature of the situation and the potential implications for health and safety, and any target related to such situations should be 100%. • There needs to be a clear and consistent definition of “reasonable endeavours” that is common to all Distributors, it is obviously not acceptable for customers in different Distribution areas to receive a variable quality of service due to differences of interpretation in this area. • We are concerned that any situation that is not resolved within the specified SLAs has the potential to be “lost” or de-prioritised as the SLA has already been breached. Where a situation has not been resolved within the SLA we believe that there should be a 100% target to resolve the incident within the next available period i.e. within the next 40 working days for Category B situations. 	<p>The Working Group agreed that if some issues are not resolved in the first month they should not be left but rather picked up in the next period. It was highlighted that there might be a particularly difficult issue that takes time to resolve, or where there is a force majeure event it may take longer to catch up.</p> <p>It was agreed that distributors should prioritise incidents which were not picked up in the previous month. It was suggested that the legal text could be updated to say we expect those that have been missed to be included in the next month’s figures.</p> <p>Action</p> <p>The importance of keeping the Supplier informed where an appointment needs to be re-scheduled was noted.</p> <p>Attendees discussed ‘reasonable endeavours’ and agreed no change was required.</p>
EON Energy	Yes. However. We have some concern how completed Cat A jobs get reported back to suppliers/Mops. Do we need to issue a D135 in order for a D126 to be returned by the DNO? At present	It was noted that the MRA rules currently state that a D0135 flow should not be sent for Category A situations. It was highlighted that Eon has not

	we have seen no D0126s returned for Cat A jobs.	<p>received a single D0126 flow back for Category As that have been reported.</p> <p>An action was taken for DNO Working Group members to check whether the D0126 flows are being sent for Category A situations. Action</p> <p>It was noted that there is a learning process to get the flows to a smooth state. There is an obligation to send the flow correctly.</p> <p>GS noted that if any DNOs would like feedback on the flows, Eon would be happy to provide this.</p>
ENWL	Yes - There are numerous conflicting demands on our resources and while we will endeavour to meet the standard every time there will be occasions where it is not possible. Subject to the caveat below & advance notice periods being agreed and adhered to.	<p>It was noted that the caveat below relates to the expected volumes from Suppliers.</p> <p>It was noted that other distribution standards are set at 90%, therefore, this is consistent with these.</p>
GTC	Yes	Noted
Northern Powergrid	Northern Powergrid would always use reasonable endeavours to support the agreed requirements of the SLA, subject to the comments in our response to the first consultation paper.	Noted
npower	We recognise the great steps being made by the Network Operators to prioritise the customers experience in this process. However, we have concerns with any Service Level that does not apply to the full population of the Cat A or Cat B situations. We would prefer to see all jobs covered by the SLA, for example 90% of Cat B situations successfully resolved within the Service Levels against 100% of Cat B situations raised, in each calendar month.	<p>It was noted that npower believe that category As should have a 100% SLA.</p> <p>The group noted the concern that 10% of issues could be carried forward indefinitely. It was suggested that the aim of the SLAs is to ensure that customers are not left waiting. The group noted that this concern had been discussed</p>

	<p>As drafted (30.5.3), the current approach leaves the position open for up to 10% of situations raised not to be worked at all, generating significant customer disruption and this could, in aggregate, contribute to a negative public perception of the national Smart metering deployment. We believe the intent of the working group is for parties to identify and attempt to resolve <u>all</u> issues that prevent the rollout of Smart meters and should certainly not create any situation where the resolution of a potential safety concern might not be covered by the Service Levels.</p> <p>Clause 30.5.1 places a notification obligation on the user or its agent to report in a prompt and appropriate manner having regard to the nature of the incident to which the report relates. The same obligation should be placed on the Company to respond and resolve in a prompt and appropriate manner having regard to the nature of the incident.</p>	<p>against an earlier consultation response.</p>
ScottishPower Energy Retail Ltd	<p>No. We believe the SLA should be 100% with performance penalties from 90%. In essence this means DNOs should be using all reasonable endeavours to meet 100%. Additionally we would only be happy with the 90% target for Category Cs. Category As must be 100%, given the safety risks.</p>	<p>It was noted that the SLA for category As is to attend site and make safe, not complete the job.</p> <p>It was then noted that there are other safety regulations that put requirements on DNOs to maintain the safety of the network, for example, the Guaranteed Standards and ESQCR. In light of this it was queried whether an SLA is needed for Category A situations. The group discussed whether only the flow to state that the issue has been made safe is relevant to the SLAs.</p> <p>It was highlighted that there is no evidence today to say that DNOs do not respond to emergency situations. It was also noted that emergency</p>

		<p>situations are reported as part of the RIGGs.</p> <p>It was noted that if a DNO has a safety issue this would be prioritised over a customer who is off Supply.</p> <p>It was queried whether, if an issue is a Category A situation that becomes a Category B after the site has been made safe, would the MOA send a flow in or would the DNO log it as a Category B. It was noted that if the MOA has left site then they would not know about the need to raise the incident as a category B. It was noted that this would need to be covered in the MOA training.</p> <p>The group noted that the SLA needs to define the response back for the Category A situations that cannot be resolved at the first site visit. It was agreed that the straw man should be updated to specify that if the Category A cannot be resolved within 4 hours it will remain as a Category A and the remedial works should be completed within 40 working days. Action</p> <p>It was noted that this may need to be captured in the reporting mechanism. Action</p>
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	We agree with the proposal that Distributors should use reasonable endeavours to meet the SLAs on 90% of occasions in a calendar month and would support interim reviews of the SLAs once the smart metering roll out has reached measurable proportions.	Noted
SP Distribution	SPEN are happy that Distributors should use reasonable	Noted.

SP Manweb	<p>endeavours to meet the SLA's agreed between Suppliers / MO's and DNO's.</p> <p>With regards to the 90% threshold - we would be interested in seeking the views of all other parties as to whether the 90% is an acceptable and achievable level.</p>	
SSE Energy Supply	Yes	Noted
UKPN	<p>Yes. At this time it is unclear what volume of work is likely to be required under each category. It would be excessive to put the DNO in breach for a single failure or to define a level of failure at which a breach occurs. Reasonable endeavours seems a sensible approach in such uncertainty.</p> <p>There may also be regional differences in the ability of DNOs to meet service levels. The time to remedy a situation in an urban area may be dependent on works outside of the customer's premises which require necessary approvals to be obtained.</p> <p>Furthermore, the source of DNO work is the supplier deciding to change to smart meters in a specific geographic area. As such should one of the larger suppliers decide to conduct a large volume of work in a small geographic area or multiple suppliers conduct work in a geographic area, the demand on DNO resources will be higher than they will be able to manage. Accordingly, a 90% threshold combined with a 115% volume rule should enable an appropriate balance between customer service and over resourcing for a limited number of peak demands to be effectively managed.</p> <p>This could be reviewed later in the light of experience.</p>	Noted
Western Power	It is unreasonable to expect the SLAs to be met 100% of the	Noted

Distribution	<p>time, particularly during the period when Distributors are ramping up their resources to support the smart roll out. The 90% figure seems to be a fairly arbitrary choice and whether it is appropriate, especially during the early stages of the roll out, remains to be seen.</p> <p>WPD would like to see a lower figure for the foundation stage and first year of the mass roll out, for example 80% until the end of 2015, and 90% from 2016 onwards.</p>	
<p>Q2 Summary:</p> <p>It was noted that the majority of respondents support 90%. Without any evidence to support a move away from 90% it was agreed that this value should remain at present. It was noted that this could be reviewed before the final CP is submitted for voting as more data will be available by this point.</p>		
Question Three	<p>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? Please provide supporting comments.</p>	Working Group Comments
British Gas	<p>We agree with the principle that should Suppliers exceed their forecast volumes by certain percentage then Distributors would be released from their obligation for that month. We understand that Distributors will be resourcing up to levels to meet SLAs based on Suppliers forecasts of meter exchanges. It is reasonable that if monthly exchanges exceed these forecast levels by a certain percentage then the obligation to meet the SLA should be relaxed.</p>	Noted
EDF Energy	<p>While we recognise the impacts on Distributors that inaccurate</p>	It was noted that concerns that poor forecasting

	<p>forecasting will have we do not agree with the notion that this should release Distributors from all of their obligations within the SLAs. The SLAs should still be able to be met for the population of meter installations that was within the original forecasts and so should still be applied; it is only those meter installations over the original forecasts that should not have the relevant SLAs applied. Our preference would be that only the Supplier(s) that have exceeded their forecasts would be penalised by not having the SLAs met but we recognise that this may not be practical for DNOs to manage</p> <p>Also, in line with our response to question 2, we would be concerned that anything that is not resolved within the SLA for whenever reason is effectively forgotten, we would like to see wording that requires the Distributor to resolve any situations that are not resolved within the original SLA to be resolved in the next available period i.e. within the next 40 working days for Category B situations.</p> <p>We are also concerned that the poor forecasting of one or two Suppliers could have an impact on other Suppliers and specifically their customers, we would therefore like to see some manner of formal follow up process with those Suppliers that persistently create these issues to ensure they do not continue to have an adverse impact on other Suppliers who are acting in good faith.</p>	<p>by one or two Suppliers could have an impact on other Suppliers is a reoccurring theme in the consultation responses.</p> <p>It was highlighted that there are no penalties from Ofgem for Suppliers installing more meters than forecasted.</p> <p>The Working Group noted that this issue is difficult to resolve as you are pooling forecasts together. It was suggested that the only way to do it might be to do it by individual Supplier. However, it was noted that DNOs do not manage jobs by Supplier, it is more likely that they will be by date.</p> <p>It was agreed that there is no sensible solution at present and the situation may not arise. 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.</p>
EON Energy	<p>Although we have some sympathy for the issue, we are not convinced that the 15% threshold is correct or the impact exceeding this effects subsequent months.</p> <p>If the limit is exceeded, does the removal of obligation apply to all jobs or just those over the % target?</p>	<p>It was noted that this was discussed earlier in the consultation responses</p>

	How will DNO know in any month that a culmination of all suppliers jobs will be over forecasted volumes or if one supplier exceeds their forecast will this have a knock on effect on their obligation to other suppliers?	
ENWL	Yes – This is forecast to be a significant volume of work for which we need to put additional resources in place. There needs to be some form of encouragement for suppliers to stick to their forecasts in order that we can manage our resources and provide the service being required of us under the SLA.	It was noted that this was discussed earlier in the consultation responses
GTC	Yes, it would be unreasonable to assume that compliance would be possible under such circumstances.	Noted
Northern Powergrid	Yes, because resource levels will be largely driven by the accuracy of supplier forecasts and should these differ greatly from actual rollout volumes this is likely to affect Northern Powergrid's ability to comply with the SLA.	Noted
npower	<p>We recognise the Network Operators require a level of good forecasting of Smart meter installations to estimate and plan their resource needs. However, where collectively Suppliers exceed any installation forecasts they have issued, the release of the Network Operators from <u>all</u> elements of the Service Levels is not appropriate.</p> <p>Suppliers will require clarity and consistency in respect of limitations of services from the Network Operators, where they are unable to maintain the Service Levels due to significant resource impacts resulting from unexpectedly high installation volumes related to Suppliers forecasts.</p> <p>Smaller suppliers may be placed at a disadvantage should larger</p>	It was noted that this has been discussed against an earlier consultation response.

	<p>suppliers actual Smart meter install volumes be greater than their original forecasts, month on month.</p> <p>We recommend that the industry considers how it might provide a level of protection to individual Suppliers, against the actions of one, or more, Suppliers who have exceeded their stated forecasts that result in a consequential failure of the aggregate forecast.</p>	
ScottishPower Energy Retail Ltd	<p>Totally disagree with the SLA being tied to smart roll out. These issues are there now; just because they may be identified at a smart meter installation does not have any relevance. In particular we think it is totally inappropriate for Category As – these are emergency situations on a DNOs network and must be resolved, irrespective of how many smart meters may be planned in their area.</p> <p>Additionally, these codes are used for all MPANs, not just those impacted by a smart roll out plan and as such it is totally incorrect to “lump” all issues under a smart banner.</p> <p>An SLA should be an incentive, but these seems to be a disincentive particularly as it is a retrospective SLA (ie a DNO can miss individual targets throughout a month but only at the end can they know suppliers’ volumes were too high so the targets do not count)</p>	<p>It was noted that this had been discussed previously and the legal text updated to apply not just to meter exchanges. Supplier reporting is only one piece of information that the DNOs will use to build their plans on. It was noted that the same resource will be used for HH meters not just smart meters.</p> <p>It was suggested that Suppliers AMR roll out plans could potentially be reported too, however, it was noted that these are potentially now close to completion, as Profile Class 5 to 8 has to be completed by April 2014.</p> <p>GS took an action to split Eon’s Supplier reporting information by smart and day today. This will give Working Group Members an idea of what normal traffic looks like. Action</p> <p>It was highlighted that it would be difficult to differentiate between smart roll out and day to day activity. In addition, it was noted that DNO will not be viewing flows by whether they are smart roll out or business as usual. Is all work that needs</p>

		<p>to be completed.</p> <p>It was agreed that it makes sense to link to the smart roll out to the SLAs at present as that is what is driving the volumes. Once the roll out is close to completion the SLAs could be reviewed. There is nothing in the straw man document that prevents the SLAs from being used for day to day issues. Previously there was no process defined but now there is.</p>
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Agreed. Should Suppliers roll out volumes which exceed their forecasts this could lead to a greater volume of defects being reported. There is a very real risk that a Distributor may not have sufficient resource in the correct geographical location to meet the SLA, due to inaccurate forecasts.	Noted
SP Distribution SP Manweb	<p>SPEN 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.</p> <p>However, before we agree to any SLA's it is imperative that we see sight of the Suppliers smart meter roll out plans to agree on an achievable and acceptable level.</p>	Noted
SSE Energy Supply	We do not believe that SSE should be disadvantaged by a DNO being released from their SLAs because another Supplier has increased their volume. In the event a Supplier exceeds their forecast volumes by a certain percentage, any release from SLA obligations should only be in relation to that Supplier.	Noted that this has been discussed against a prior question.

UKPN	<p>Yes. This removes an element of uncertainty and recognises a sudden increase in volumes is unlikely to be met with an instantaneous increase in resources. However, it may be preferable to measure this against the number of attempted meter exchanges, as opposed to successful meter exchanges, so that the number of DNO intervention cases does not reduce the total volume.</p> <p>It may be helpful to add T-1, T-2 and T-3 to the supplier report at Part 4 of the proposed Schedule 23. It may be helpful to break that down between successful meter exchanges and attempted meter exchanges.</p>	<p>It was suggested that the actual figures should be based on the number of premises visited not meter exchanges.</p> <p>The group discussed this comment and agreed to update the legal text to say 'planned' volume rather than 'achieved' volume. Action</p> <p>Also, it was queried whether the Supplier would be released from their obligation on the +/- 15% if the DNO does not meet their target, as Suppliers might have to do planned jobs the following month if the DNO does not meet their target.</p> <p>More consideration needed on this point. Action</p>
Western Power Distribution	<p>WPD agrees with the principle of releasing obligations on Distributors in the event of high volumes, but not with the proposed detail, for the following reasons:</p> <ul style="list-style-type: none"> • The volume of meter installations is immaterial, what matters is the volume of defects the Distributors have to resolve i.e. above average defect rates within forecast volumes would be just as problematic as average defect rates and above forecast volumes • Suppliers only have to report "forecast" volumes in advance, not "actual" volumes in arrears. Consequently it is unclear how this procedure will work in practice • Total volumes rather than average volumes for the month should be employed as this will more accurately reflect the workload on the Distributor • The obligation is only released for the month in question yet 	<p>It was noted that WPD agree in general but have some concerns.</p> <p>It was agreed that there is a fundamental question on how DNOs will know if the SLAs are released if there is no mechanism for Suppliers to report actual roll out volumes?</p> <p>It was noted that the requirement to report roll out volumes sits with DECC. It was agreed that the DECC publication time lag will need to be known so that the SLA timescales can take this into account. Action</p> <p>It was suggested that the pre-determined defect rate (percentage defect rate) could be calculated now based on current data. However, it was highlighted that this would be very difficult and would depend on the geography. It was noted to</p>

	<p>there is the potential for a consequential impact on subsequent months whilst any backlog is resolved.</p> <p>WPD suggests that the SLA obligation is released if the number of reported defects in the month exceeds, by a certain percentage, the total forecast volume of meter installations across all Suppliers for the month multiplied by a pre-determined defect rate. This approach takes account of a variation in either volumes or defect rate.</p> <p>WPD also suggests that the number of defects over and above this percentage limit is carried forward into next months reported defects figure as a means of mitigating the consequential impact of excess volumes.</p> <p>For example:</p> <p style="padding-left: 40px;">Total forecast volume for month = 50,000 installs Pre-determined defect rate = 3% Excess limit = 15%</p> <p style="padding-left: 40px;">Estimated number of defects = $50000 \times 3\% = 1500$ defects Excess limit = $115\% \times 1500 = 1725$ defects</p> <p style="padding-left: 40px;">Actual defects reported during month = 1995 Excess defects brought forward from previous month = 0 $1995 + 0 - 1725 = 270$ defects above excess limit</p> <p style="padding-left: 40px;">The SLA obligation on the Distributor would be released and 270 excess defects would be carried forward to the</p>	<p>attendees that the WPD default rate varied from 17% in one area down to 2.5% in another.</p> <p>It was noted that there could be an age element to current meter exchanges therefore the current default rate might not be reflective of the population as a whole once the smart meter roll out picks up.</p> <p>It was queried whether any values were included in the DNOs RIIO-ED1 business plans. It was agreed that DNOs figures should be revisited to provide insight. It was noted that in addition, Suppliers may also be able to provide insight.</p> <p>Action</p> <p>It was noted that from a DNO perspective it is the geographical problems that will need to be dealt with, for instance, 1960 tower blocks.</p> <p>It was highlighted that for multi occupational buildings there is a G87¹ document being drafted to define who owns what in each area. However, this is only for new installations. There are still difficulties around legacy assets.</p> <p>It was noted that without agreement on the boundaries and ownership, issues may be passed around.</p>
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¹ G87 - Guidelines for the Provision of Low Voltage Supplies to Multi Occupancy Buildings

	<p>next month</p> <p>WPD would like to point out that the wording used in question 3 is “exceed...forecast volumes by a certain percentage”. An alternative form of words has been used in the straw man specification, which has a significantly different interpretation.</p>	
Question Four	4. Should this percentage be set at 15%? Please provide supporting comments.	Working Group Comments
British Gas	We agree that 15% would seem reasonable initially	Noted
EDF Energy	The 15% specified within the straw man seems to be reasonable; however we would like to understand if there is any specific logic that has been used in determining this figure.	It was highlighted that the 15% value came from the guaranteed standards for un-metered connections and, therefore, is consistent with other industry standards.
EON Energy	We would like to understand the rationale behind the 15% figure and the answers to our questions under Q3 before we could comment if this figure is appropriate.	See above
ENWL	<p>5 % feels like a more reasonable tolerance to manage within as this will have some scope to flex resources to respond to increased or reduced volumes. To a degree fluctuations can be managed by varying mean time to appointment but if volumes are consistently out of synch with forecast this will become a problem. If volumes are consistently low we will have stranded resource and cost – if volumes are consistently high we will see increased meantime to appointment.</p> <p>It might be worth considering a volume and % threshold. We are forecast for 160,000 cut-out changes as a result of the smart meter roll-out (5 years). This is 32,000 per year or 2,667 per</p>	<p>It was noted that the latest roll out report published by DECC shows significant variations from the prior one which was published three months earlier. For instance, between these two reports over one million less meters are to be installed in the foundation stage. This new base line is significantly different from the old one therefore it is difficult for DNOs to accurately forecast going forward.</p> <p>It was noted that one of the aims of the DCP 153 straw man was to give a better idea by year on a</p>

	<p>month. 15% is an additional 400 cut-out changes per month – which could require 4 additional teams. For ENW , 5% seems high enough.</p>	<p>rolling basis.</p> <p>It was highlighted that as time progresses the forecasts will get increasingly accurate.</p> <p>The group agreed that there was not sufficient justification to move away from the 15%. It was agreed that all of the figures will need to be reviewed once more data is available.</p> <p>It was noted that DNOs can only ask for the money for the staff that they believe are necessary based on the information that Suppliers have given them.</p>
GTC	<p>This seems to be a reasonable percentage as a starting point without any further evidence to suggest an alternative.</p>	Noted
Northern Powergrid	<p>Whilst it is difficult to say whether a 15% metric is correct, it is useful to have a level of performance set to start the programme rolling. It might also be useful to agree a 'honeymoon' or 'bedding in' period to allow parties to get acclimatised to the SLA arrangements. There may also be a benefit of holding an annual review of this figure, so that when supplier's programmes are in full rollout this level of performance can be checked and adjusted if necessary</p>	Noted
npower	<p>Please refer to our response to Q3 outlining implications of Suppliers exceeding Smart install forecasts.</p> <p>Notwithstanding, the fact that we do not agree that Network Operators should be released from all obligations of the proposed Service Level at any volume, we recognise that it may be appropriate to apply a service level derogation to enable the</p>	Noted

	Network Operators to respond most effectively to Cat B events (as our assumption is all Cat A cases will be worked), but we would not expect the trigger for such a derogation to be below <u>20%</u> of aggregate install volume in a given month.	
ScottishPower Energy Retail Ltd	There should be no percentage.	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	We believe this should be set at 10% which would be consistent with the 90% 'reasonable endeavours' target within the SLAs.	Noted
SP Distribution SP Manweb	With regards to the 15% level, SPEN would be interested to see why the figure was set at this level – and how this would be measured? If all suppliers were to exceed install volumes by 5% in a Distribution region, this would have a huge impact on FTE and availability?	Noted
SSE Energy Supply	This seems acceptable.	Noted
UKPN	Yes. This seems a fair start point and is similar to the mechanism used in Guaranteed Standards of Performance for unmetered connections.	Noted
Western Power Distribution	The 15% figure seems to be a fairly arbitrary choice and in WPD's opinion is much too high. During mass roll out there will be 1.4million meter installs per annum in the WPD area. Assuming a 3% defect rate this equates to 42000 defects per annum, or 3500 per month. A 15% excess	Noted

	<p>equates to 525 defects in the month. Bearing in mind that a cut out change is a two person operation (because it is done live) and that the resolution of each defect is likely to take several hours, this excess workload represents a huge resource commitment that WPD is expected just to absorb before any consideration is given.</p> <p>Suppliers are required to forecast their installation volumes and it is reasonable to expect Distributors to resource up to deal with the anticipated number of associated defects. However, Distributors would not have additional resources standing idly by “just in case”. Distributors are not in a position to second guess the actions of Suppliers, nor to predict when/where above average defect rates are likely to occur. Consequently the SLA obligation should be released whenever volumes are above forecast i.e. the percentage should be set at 0%.</p>	
<p>Q4 Summary:</p> <p>The Working Group noted that three distribution companies do not agree with the 15%. Four distributors agree, one of which is an IDNO with low volumes. All Suppliers agree with setting the value at 15%.</p> <p>The group agreed that this is a starting position and, similar to the other straw man values, can be reviewed prior to the Change Proposal being issued for industry voting.</p> <p>It was noted that there is no comeback on Suppliers if they exceed their 15%, it is a reporting tool only. It is the defect volumes that will affect DNOs, not the roll out volumes.</p> <p>It was suggested that there should be a bedding in period after the CP takes effect, then if any refinements are needed these could be addressed six months to nine months after DCP 153 is implemented. It was cautioned that Ofgem could decide to introduce an incentive which would affect those not meeting the SLAs during the bedding in period. It was noted that a review date could be built in to the DCUSA. The Working Group agreed to progress with 15% and review the value after six to nine months of implementation.</p>		

Question Five	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?	Working Group Comments
British Gas	As IDNOs should have much newer networks the number category A,B and C instances should be much less. We do not believe therefore it will be necessary to provide forecasting at IDNO level.	Noted
EDF Energy	<p>We believe that it should be possible to derive the projected volumes for IDNOs from the reporting that is proposed to be provided to Distributors. IDNOs tend to operate in specific postcode areas and so it should be possible to derive the number of planned installs on IDNO networks from the postcode level reporting that is already specified.</p> <p>We also believe that the number of category A and B situations reported for IDNOs should be very low as not only are the volumes of metering systems for IDNOs more limited, but these would usually be new networks and so we would not expect to find many issues with DNO equipment that has not been in situ for very long.</p> <p>As a Supplier we would not easily be able to forecast our installation volumes for IDNOs; and any requirement to do so will create an additional reporting overhead and is likely to have a limited level of accuracy.</p>	Noted
EON Energy	IDNO volumes are likely to be small and on new networks, therefore, don't see any issues for them and therefore no need to extend the Supplier volume forecasting for IDNOs.	Noted

ENWL	We need geographic area of activity as well as volume / time forecast. Suppliers face exactly the same problems that we face. We need suppliers to work in specific areas.	Noted
GTC	Unfortunately we do not have any suggestions in regards to this but we agree with the working groups' assessment that the current forecasting will not work for IDNO's. However we believe that there may be less initial impact on IDNOs and believe that the lack of forecasting may be a moot point. Our only suggestion is that IDNO's do not have any forecasting for the time being but that a review meeting should be set up to analyse the impact of this post go live for all relevant parties. The meeting could also review the percentages set by this change proposal.	Noted
Northern Powergrid	No comment	Noted
npower	IDNO's should form their own proposals if their requirements are different from the DNO's. However, they should still be subject to the same SLA's as all DNO's.	Noted
ScottishPower Energy Retail Ltd	See previous comments – do not agree with forecasting.	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	We believe this is for IDNOs to respond to.	Noted
SP Distribution SP Manweb	SPEN have no views on how the Supplier Volume forecasting for IDNOs should work.	Noted

SSE Energy Supply	No	Noted
UKPN	<p>Forecasting should be by GSP group.</p> <p>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.</p> <p>Adding T-1, T-2 and T-3 to the supplier report at Part 4 of the proposed Schedule 23 will help the IDNO identify whether the forecast was exceeded, albeit retrospectively.</p>	<p>The Working Group agreed that it seems reasonable that if the volume is excessive in a particular GSP Group then IDNOs in that particular region should also be released from the obligation. It was agreed that the straw man document should be updated accordingly. Action</p>
Western Power Distribution	WPD has no views on this matter.	Noted
Question Six	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? Please provide supporting comments.	Working Group Comments
British Gas	Yes we agree that the correct asset condition code should be provided back to the organisation reporting the fault. This will enable corrective training to be undertaken to prevent misreporting in the future.	Noted
EDF Energy	We believe that the D0126 flow issued once a situation has been remedied should contain the Distributor's view of the correct	The Working Group agreed that the straw man document should be updated to say 'category'

	<p>asset condition category (not code) where different from the category reported on the D0135, i.e. if a category C situation has been incorrectly reported as a category B situation. We do not regard the misidentification of situations within a category as being a material issue as the same impacts (in terms of ability to install a meter) and SLAs would apply, and we would be concerned about the amount of data that might be received and need to be managed were all incorrect asset category codes to be reported on dataflows.</p>	<p>rather than 'code'. Action</p> <p>It was noted that if there are multiple faults at a premises then only one will be reported in the data flow. The Working Group discussed whether this would be an issue for DNOs. It was agreed that the DNO staff attending should have the skills required to deal with multiple faults. In addition, they should attend the site with a view to carry out an assessment of the situation and thus may find other faults. It was noted that time constraints may be an issue if the staff member attending has other jobs scheduled as only one fault was expected.</p> <p>It was noted that the MOCOPA guidance states that the issue that is most significant should be reported in the data flow. The Working Group agreed that the guidance document should be reviewed to see if it states that additional fault codes should be included in the free text field of the D0135. Action</p>
EON Energy	<p>Yes, this enables reporting of where they differ which could be used to address deficiencies in training at the ability to identify the correct asset condition code at either the DNO or MOP.</p>	<p>Noted</p>
ENWL	<p>Yes – this should encourage operators to improve field knowledge which ultimately should mean only work that needs doing is passed through. Need to be clear what happens as a consequence of significant error rates as this could just become a moot debate.</p>	<p>Noted. It was noted that significant error rates will be discussed by the group.</p>

GTC	Yes, without this it will be impossible to analyse how the process and parties are performing from the distributors' point of view.	Noted
Northern Powergrid	Yes, we see this as a useful check to ensure that reporting is being done accurately. It will also provide an effective mechanism for ensuring that the information being received is accurate and consistent. It will also allow Distributors' to determine whether individual suppliers operating in Northern Powergrid's service territory are performing in line with both the detail and the spirit of the SLA.	Noted
Npower	Yes, we agree.	Noted
ScottishPower Energy Retail Ltd	Yes, agree the DNO should respond with the correct asset condition code.	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	<p>We do not agree that the D0126 response is the correct vehicle for reporting a different asset code than the one originally reported in the D0135. As the DTC stands it is not part of the flow and would require a new flow or an amendment to the existing flow. This would require an MRA change proposal.</p> <p>Incorrect reporting of codes could be included in monthly reports and in the case of a safety implication it should be reported to the originator bi-laterally in a real time method e.g. a telephone call. This would be more effective than a dataflow.</p>	Noted
SP Distribution SP Manweb	SPEN agree that if a D0135 has been classified wrongly within the same Category – I.E – B01 instead of B02 – this may be ok providing the Distribution Engineer is the correct resource to remedy the fault. If not, the flow may have to be rejected and resubmitted. If it is found that the fault has been classified	Noted

	<p>wrongly and can be remedied – this should be reported back to the supplier on the D0126.</p> <p>If the D0135 has been classified as a Cat B instead of a Cat C, this should be rejected as it the Supplier will impact on the Cat B SLA of 40 WD's.</p>	
SSE Energy Supply	Yes, to ensure continuous improvement for reporting	Noted
UKPN	Yes, this will help if there is charging for the extra costs of mis-categorised work. It also provides a feedback to the originator.	Noted
Western Power Distribution	WPD agrees with the proposal but would like to point out that the inclusion of this information is not a compulsory requirement of the D0126 data flow.	Noted
<p>Q6 Summary:</p> <p>The Working Group agreed that guidance should be given through the MRA and MOCOPA on how to use the data flows such that the asset condition code in the D0126 is used to report the category that Distributor believes it should have been. Action</p>		
Question Seven	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? Please provide supporting comments.	Working Group Comments
British Gas	We do need a consistent agreed procedure that all DNOs will follow for notifying the supplier when an SLA cannot be met. We could include a specific clause that states that the DNO will notify the supplier in accordance with the guidance note rather than including a detailed procedure within the DCUSA as this can	It was noted that an agreed process does not need to sit in DUCSA.

	then be amended more easily going forward.	
EDF Energy	We believe that it would be preferable to include this sort of information within a guidance note as this would make the documentation more easy to manage and would not require a CP to be raised if amendments were required based on operational experience. It also allows for some flexibility depending on the exact nature of the situation (such as a force majeure event) which may not be available in the DCUSA.	Noted
EON Energy	Either method is acceptable. We have no preference as long as it is documented.	Noted
ENWL	Indifferent as to where it is as long as it exists	Noted
GTC	We believe that a guidance document might be best suited to this situation.	Noted
Northern Powergrid	Northern Powergrid would like a Guidance Document. This would provide user clarity and would be easier to amend as this could be managed and /or changed without the need for a DCUSA change proposal.	Noted
Npower	This should be in DCUSA and subject to change controls along with the same notification SLA	Noted
ScottishPower Energy Retail Ltd	Added to DCUSA for now. However, if in time the updates are taking too long or are too costly they could be moved to a guidance document.	Noted
Southern Electric Power Distribution plc and	We would suggest this requirement should be discharged through a guidance document We do not believe DCUSA is	Noted

Scottish Hydro Electric Power Distribution plc	appropriate as it is not intended to be an all-embracing process document.	
SP Distribution SP Manweb	Where an SLA cannot be met, there should be a process to notify the Supplier of the reasons. For example – there may be NRSWA requirements which may mean that the DNO has to ‘stop the clock’ effectively and this needs to be taken into consideration as even with the best endeavours the 40 day SLA will not be met. This may also be the case where a planned outage for multiple customers needs to take place as the DNO will need to notify customers and organise on site generators, etc.	Noted
SSE Energy Supply	A guidance document would ensure consistency	Noted
UKPN	<p>Under the proposal for Category A jobs, it would seem sensible to have contact details for the MOP operative, if they are remaining on site, if anything should cause the DNO a delay. It is unclear why the Supplier needs to be further informed – are they aware of the matter? The DNO’s focus should be on resolving the issue.</p> <p>Under the proposal, for Category B jobs, the DNO will be attempting to make an appointment with the customer and will inform the supplier when that will be. If the appointment falls outside of the SLA or the DNO has not confirmed an appointment within the SLA the supplier will know this. Suppliers can monitor whether the DNO has responded to a D0135 flow or not. It is not clear what further information is required under 30.5.6.</p>	Noted
Western Power Distribution	Neither. There should be no requirement to notify Suppliers and Meter Operators that an SLA cannot be met.	It was noted that where an issue has been passed to the DNO, the Supplier knows that the SLA is

	<p>Suppliers and Meter Operators know what the Distributor SLA obligations are, and when they made the phone call / sent in the dataflow. If they have not received a D0126 dataflow that confirming defect resolution or dispute by the relevant timescales they can infer the answer for themselves.</p>	<p>that the work should be completed within 40WDs. If no information is received from the DNO then the Supplier will not know if the job has been completed or whether no appointment has been made. In these circumstances suppliers would need to chase up the DNO.</p> <p>It was highlighted that if the DNO 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.</p> <p>It was clarified that the requirement to notify in the straw man is where an appointment cannot be made or the job has not been completed in the SLA timescales. Therefore, the absence of a flow within 10 WDs would indicate that that part of the SLA has not been met.</p> <p>It was agreed that it should be clarified that the Supplier should be notified in advance where the DNO knows that the SLA cannot be met. This will prevent Suppliers from sending staff to a premises only to find out after that the DNO cannot make the appointment. Action</p> <p>It was noted that the D0126 in its current format cannot be sent to say that the SLA cannot be met.</p>
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Question Eight	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?	Working Group Comments
British Gas	We could not identify any obvious flow, possibly the D0167 which has 200 characters of free format text that could be used. Flow goes from SFIC to Supplier. If a new flow is required we would suggest e-mail notification to dedicated named e-mail box initially.	<p>It was queried whether the D0167 is used much at the moment. It was noted that to use it for this purpose would require those that can send the flow to be extended to the MOP.</p> <p>It was suggested that the Issue Resolution Expert Group (IREG) may be best placed to determine the most appropriate flow. It was agreed that an action should be taken to ask IREG. Action</p>
EDF Energy	<p>We believe that the only dataflow that would appropriate for this purpose would be the D0126; however we would not want to receive a D0126 flow purely notifying us that the SLA is not going to be met as we are able to determine that from the absence of the D0126 within the relevant timescales.</p> <p>In order to minimise the amount of flow traffic that needs to be sent and managed we would only want to be notified when an appropriate person has been scheduled to resolve the situation, or if anything occurs that would mean that the appointment would not be carried out on the planned date. As noted in the answers to previous questions we would expect this to be within the next available period after the original SLA period.</p>	Noted
EON Energy	<p>We could consider using D0001 & D0002 flows.</p> <p>We believe there should be some financial penalty for DNOs not</p>	Noted

	meeting SLA's. Suppliers will be penalised for miss-reporting job (i.e. charged) we believe there should a similar reciprocal incentive for DNOs to report jobs and meet their SLA?	
ENWL	Unsure for discussion.	Noted
GTC	We would question whether a data flow would need to be used at all and that e-mail may be sufficient in such circumstances. However if centralised reporting is to be developed then it would be necessary to utilise a data flow to ensure that this activity is recorded. In this case an update to the D0126 data flow may be required or another data flow may need creating.	Noted
Northern Powergrid	We should wherever possible utilise the existing data flow process. Consideration should be given to adapting data flow D0135 as appropriate.	Noted
Npower	<p>30.5.5 (second instance) and 30.5.6 (first instance) – Agree Company should notify User and the Meter Operator Agent of it's inability to meet the service levels for Cat A and Cat B respectively. The notification should be made within the service level window – i.e. inform within 3 hours the User and Meter Operator Agent that the Company is unable to attend and resolve a Cat A case, and 10 days in respect of scheduling appointments and 40 days to resolve a Cat B case.</p> <p>In order to meet this notification proposal the D0126 flow requires amendments to the 'completion flag' component. This could also include if necessary another group to indicate a 'failure reason code' to help explain the SLA failure.</p> <p>For the time being we could utilise the D (Disputed) completion flag with additional free text to explain the Cat B is not really</p>	Noted

	<p>disputed, but delayed or unable to be worked by the Company within the defined service level period.</p> <p>The D0126 flow is the most relevant method, but may require change in it's structure or some form of work around (free form text).</p>	
ScottishPower Energy Retail Ltd	Not sure an existing flow could be amended to provide this. Is a new flow easier?	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	We do not agree a dataflow should be used unless developed and agreed through the MRA governance.	Noted
SP Distribution SP Manweb	n/a	Noted
SSE Energy Supply	We have no comment on this question.	Noted
UKPN	See response to Q7. Placing such an obligation on DNOs is an unnecessary administrative burden.	Noted
Western Power Distribution	<p>In WPD's opinion there should be no requirement to notify Suppliers and Meter Operators that an SLA cannot be met (see response to Q7 above).</p> <p>A D0126 data flow is not suitable for sending this time and date information in its current form. It could be modified or a new data flow could be created specifically for this purpose (the latter would be more preferable). Irrespective of which option is chosen, it will entail system changes for both DNOs, Suppliers and MOPs, which would take time to implement. It would also</p>	Noted

	<p>be necessary for other organisations (MRA, MOCOPA etc) to consult and agree to these changes before they could be implemented.</p> <p>WPD has only recently completed the necessary system changes to implement revised D0135 and D0126 data flows (came into effect on the 10th December). There is no appetite for repeating this exercise for a second time.</p>	
Question Nine	<p>9. Do you agree that the Distributor report should be produced within 15 Working Days of the end of each calendar month? Please provide supporting comments.</p>	Working Group Comments
British Gas	Yes this seems reasonable	Noted
EDF Energy	<p>We believe that producing the reports with 15 working days is reasonable.</p> <p>We do however have some concerns about reporting by Distributors, and specifically the need to ensure that all Distributors report their performance on a consistent basis to allow for useful comparisons to be made. In the past a lack of clarity or precision around the definition of industry reporting requirements, for example Elexon PARMS reporting, has led to different interpretations of the requirements and a lot of subsequent re-work to try and get consistency. We believe that the current wording of the reporting requirements in the straw man are not robust enough and are open to interpretation.</p> <p>A specific area that would need to be clear is how individual situations are identified as being within a calendar month, would this be based on the date the situation was identified, or the date on which is reported to the Distributor? In either case,</p>	Noted

	<p>given that the SLA for category B situations is 40 working days, then the date of the situation being reported and the situation being rectified could be in different calendar months and therefore different reporting periods.</p> <p>Our recommendation would be that reporting for a calendar month would be based on the target SLA resolution date (i.e. the end of the 40 day window) being within that calendar month, this would then more easily allow for reporting as to whether the SLAs had been met as the SLA timescales will always have elapsed and will either have been met, or not met.</p>	
EON Energy	Yes	Noted
ENWL	Yes	Noted
GTC	We cannot see any issues with this timescale and therefore support it.	Noted
Northern Powergrid	Yes, 15 working days seems to be reasonable.	Noted
Npower	Yes, we agree.	Noted
ScottishPower Energy Retail Ltd	Yes	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	As per our original response we agree that 15 Working Days is reasonable.	Noted
SP Distribution	Yes, 15 working days following the calendar month is acceptable.	Noted

SP Manweb		
SSE Energy Supply	This seems acceptable	Noted
UKPN	Yes this should be achievable.	Noted
Western Power Distribution	<p>WPD does not agree with the proposal.</p> <p>This proposal is overly and unnecessarily stringent. Suppliers are to report on a quarterly basis, and by comparison, the reporting requirement for Distributors is disproportionate.</p> <p>It is unclear as to what benefit is gained by this proposal compared to a more moderate one. WPD suspects there is none.</p> <p>WPD believes that Distributor reporting should be on a monthly basis, one quarter in arrears. In other words January's report should be submitted by the last working day of April, February's by the last working day of May, and so on.</p> <p>The rationale for the reporting three months in arrears is to support the suggestion proposed in the response to Q3. In other words, Distributors would report the number of Category A and B situations reported to it in the month. If the total exceeds the agreed excess limit the SLA obligation would be released. Distributors would also report the number of these situations which were visited and rectified within the service level. Obviously 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.</p>	<p>It was noted that an action can only be reported once it is complete. If the report was to be issued two months later then there would be no difference in the report itself, it would just be issued later.</p> <p>The Working Group agreed that the reporting proposals in the straw man should be left as they currently are. It was agreed that the reporting dates should be looked at as part of the post implementation review.</p>

Question 10	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? Please provide supporting comments.	Working Group Comments
British Gas	Yes this seems reasonable.	Noted
EDF Energy	<p>We believe that this is reasonable; however we note that any reporting requirements on Suppliers in regards to their rollout targets and plans should be defined very clearly so as to mitigate the risk of any difference in interpretation of the reporting requirement.</p> <p>Also, any reporting must be on the same basis as existing or planned requirements from Ofgem and DECC around Supplier smart metering rollout forecasts. This is necessary to minimise the additional cost to Suppliers of meeting these reporting requirements, and to ensure that all forecasts present a consistent view of the smart metering rollout.</p> <p>We also note that the reporting will also only identify the volumes of planned smart metering installs, we therefore assume that „business as usual“ volumes additional to this, for example for AMR or legacy metering, are already being accounted by Distributors and it is only the additional workload created by the smart metering rollout that creates an issue.</p>	Noted
EON Energy	<p>Reports should be aligned with Ofgem and DECC reporting requirements. It will be onerous to keep re forecasting. Providing different plans to different organisations at different times is unmanageable, and will lead to inaccuracies and a need to explain differences.</p>	Noted

ENWL	<p>Yes – though I am concerned that this could be seen as an opportunity to rebase the forecasts and leave us with stranded resource – there is a significant lead-in time to mobilise the resources we need for the projected work volumes.</p> <p>The lead-in time for mobilising resources could be up to 12-months so we need an initial assessment at least 12-months in advance, which could then be tweaked on a quarterly basis. The suppliers need to consider a steady roll-out plan with peaks smoothed.</p>	<p>Noted.</p> <p>It was noted that ENWL would like the reporting to be structured in such a way as to smooth out peaks.</p> <p>It was highlighted that once the peak DNO resource level is reached staff will not be let go and re-hired in line with peaks and troughs in the roll out volumes.</p> <p>The Supplier reporting will allow DNOs to determine the point at which they want to reach the peak staffing level.</p>
GTC	As IDNO's are not currently part of the forecasting data this has no impact on us.	noted
Northern Powergrid	Yes, we think this is a reasonable frequency of reporting and will ensure that the volumes are being refreshed on a regular basis.	noted
Npower	<p>No. Suppliers already report Smart install forecast by DNO region to DECC, and this is made available to Network Operators (aggregated). This report and its timetable as agreed with DECC, should be the source for use within this SLA.</p> <p>Our assumption is that this Service Level proposal is expected to endure beyond the main deployment of Smart meters. How does the working group envisage the forecasts will operate beyond 2019?</p>	<p>The Working Group clarified with Npower that they would like the reporting to be in line with DECC and Ofgem requirements.</p> <p>It was agreed that the reporting requirements post-2019 are best reviewed nearer this date as goals may have changed by this point.</p>
ScottishPower Energy	We do not support providing this information. If data is to be	It was noted that the DECC reporting data was

Retail Ltd	provided, this should be aligned to the level of detail we are required to provide DECC (this principle was discussed at the CERG OI and seems reasonable). We should not agree to anything that requires another suite of reports or a different cut of ones we are already committed to	published on 29 January 2013. It was agreed to align the straw man reporting dates with the DECC dates providing that they are not more than quarterly. Action
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	<p>We agree but additional reports should be required from Suppliers to assist DNOs:</p> <ul style="list-style-type: none"> - Monthly rolling reports confirming volumes being as forecasted (to within +/- 10% of forecasts) or highlighting changes greater than + or – 10% of forecasts - Annual reports of both forecasts and actual results <p>These additional Supplier reports would assist the Distributor in economic and efficient resource planning and deployment.</p>	<p>It was noted that the annual report of forecasts and actuals is part of the DECC reporting currently.</p> <p>It was noted that several consultation respondents had requested actual volumes from Suppliers. It was agreed that the straw man table should be updated accordingly. Action</p>
SP Distribution SP Manweb	SPEN 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 and the frequency will allow for better resource planning.	Noted
SSE Energy Supply	This seems acceptable	Noted
UKPN	Yes this should be achievable.	Noted
Western Power Distribution	WPD agrees with the proposal. The reporting requirements are reasonable.	Noted

Question 11	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? Please provide supporting comments.	Working Group Comments
British Gas	Yes the supplier forecasts are commercially sensitive and should only be sent direct to distributors and not published on the DCUSA website	Noted
EDF Energy	We agree that this is should be the case, this information should not be able to be accessed by anyone other than the Distributors to whom it applies as no other party has any right to, or legitimate use of, this information.	Noted
EON Energy	Supplier reports should be kept confidential.	Noted
ENWL	E mailed directly to distributors.	Noted
GTC	As IDNO's are not currently part of the forecasting data this has no impact on us.	Noted
Northern Powergrid	Yes, we would prefer that any reporting should be done on a bilateral basis and support Supplier reports being e-mailed directly to distributors.	Noted
Npower	Yes, we agree.	Noted
ScottishPower Energy Retail Ltd	Information cannot be published on the DCUSA website.	Noted
Southern Electric Power Distribution plc and	This question is best answered by Suppliers as they own the reports. However, we would prefer to have nominated e mail	Noted

Scottish Hydro Electric Power Distribution plc	recipients if e mail is the preferred option rather than have information routed through individual DCUSA contract managers.	
SP Distribution SP Manweb	SPEN feel that the Supplier reports should be published on the DCUSA website. Individually the files may be too large to send and the internal distribution list will be large. It would be better if the files were published in a central DCUSA private location with all users agreeing to a confidentiality agreement regarding the misuse of data.	Noted
SSE Energy Supply	This seems acceptable	Noted
UKPN	We have no preference so long as we receive this information from all suppliers in an efficient way.	Noted
Western Power Distribution	<p>WPD does not agree with the proposal.</p> <p>Distributor reports are to be published on the DCUSA website and Supplier reports should be treated in a comparable manner.</p> <p>There should be a central repository containing all the reports which are accessible by all interested parties, for the following reasons:</p> <ul style="list-style-type: none"> • There are multiple suppliers each providing separate reports for numerous distribution licence areas several times per year. That is a lot of information to be disseminated by the Secretariat and collated by the Distributors. This administrative burden can be avoided if the website is used • Emails sometimes go astray • The roll out is over a long time frame and hence there 	<p>It was suggested that an alternative is that DECC could ask for information at a more granular level. DCUSA could pass the information to DECC who could then pass it out. This suggestion was discussed and it was determined that this could not be prescribed in the DCUSA.</p> <p>It was highlighted that Distributors are in a monopoly position whilst Suppliers are in competition, thus, the argument for different reporting rules.</p>

	<p>are likely to be people changes along the way</p> <ul style="list-style-type: none"> • The central repository would give Distributors and Suppliers visibility of the national picture, not just a narrow local one • Readers can be confident that they are looking at the definitive report 	
<p>Q11 Summary:</p> <p>It was suggested that it would be best to get Distributors to prepare this information and cut it how they choose to do so. It was noted that most of the responses from Suppliers is that the information should be confidential. The Working Group agreed that the straw man should be updated such that DNOs are responsible for sending the report directly to all DNOs. Action</p> <p>Attendees agreed that principle that no reports should be published.</p>		
Question 12	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? Please provide supporting comments.	Working Group Comments
British Gas	I think in the first instance this should only be published on the private section. I would support a formal bedding in period where both suppliers and DNOs can work together to achieve a smooth implementation of the new SLAs. Perhaps with some regular monthly meetings to review performance agree how any performance issues by any party can be handled.	Noted
EDF Energy	This question does not appear in the body of the consultation and so it is not clear which report this applies to. As detailed in our answers to other questions in this consultation we believe that Supplier reporting should not be published on the DCUSA	Noted

	web-site at all and should be sent directly to Distributors, any reporting on Distributor performance against the SLAs should be published on the private section of the web-site.	
EON Energy	Supplier reports should be confidential.	Noted
ENWL	Private section.	Noted
GTC	Unless the information within is deemed to be sensitive or private in any way then there is no reason why this could not be published on the public section of the DCUSA website in the spirit of transparency subject to normal data protection rules.	Noted
Northern Powergrid	Northern Powergrid would prefer that any reporting from or to suppliers should be done on a bilateral basis.	Noted
Npower	No. Confidential information such as this should not be shared or managed by 3 rd party arrangements	Noted
ScottishPower Energy Retail Ltd	Unclear which “report” is being referenced here. The supplier report cannot be published anywhere on the DCUSA website.	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	We do not believe it is appropriate or beneficial for the report to be on the DCUSA website.	Noted
SP Distribution SP Manweb	SPEN believe the report should be published on the private section of the DCUSA website. Publically available information may only lead to criticism by parties that are not aware of the complexity of the processes involved.	Noted

SSE Energy Supply	This seems acceptable	Noted
UKPN	We have no preference so long as we receive this information from all suppliers in an efficient way.	Noted
Western Power Distribution	There should be the intent to be as open and transparent with the information as is possible. Consequently, the report should be published in the public section of the website unless there are legitimate concerns that this could be exploited in some pernicious way, in which case the private section should be used.	Noted
Q12 Summary: The Working Group noted that after reviewing the responses to question 11 it had been agreed that reports should not be published.		
Question 13	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? Please provide supporting comments.	Working Group Comments
British Gas	As we understand it DNOs will be funded to support smart meter roll-out but not for additional work such as additional out of hours work or unnecessary call outs. It is right that suppliers that cause unnecessary costs to the DNO should be charged these costs. However currently we do not believe we have the necessary guidance from DNOs to ensure appropriate training can be given to operatives to ensure situations are correctly reported. Any charging of additional costs by DNOs should not commence until a suitable bedding in period has elapsed and	The importance of the guidance and bedding in period was noted.

	any training issues have been rectified. Another consideration is that we do not want to encourage a culture where meter operatives are deterred from reporting potential safety issues for fear of financial penalty.	
EDF Energy	<p>We recognise that Distributors will incur additional costs where situations are misreported by the Meter Operator Agent and so it would be reasonable for Distributors to levy charges to recover these costs. However these costs must be reflective of any actual additional cost incurred by the Distributor, and should not be punitive. We also believe that there should be an initial period following the start of the mass rollout of smart meters where the levies are not applied as the initial period will be one of learning for all parties, and there should not be anything that should disincentivise meter installers from reporting situations that they believe are a health and safety issue for fear of financial penalties being incurred.</p> <p>In regards to charging we would note that there should potentially be a charge that Suppliers should be able to levy against Distributors where they have failed to meet their obligations. In the situation where the Distributor has notified the Supplier that a situation has been resolved and a subsequent meter installation visit shows this not to be the case and the installation has to be aborted again, the Supplier should be able to recover the costs of this site visit as the Distributor has not completed their work satisfactorily and the notification of the same is incorrect.</p>	It was noted that the cost should be the extra cost on top of what would normally be incurred, not the full cost.
EON Energy	Need guidance to inform suppliers, agents and DNOs what should be reported as what category that is agreed by all users before any charging applies. We would also like to see a trial	Noted.

	period once this guidance is adopted to allow all users to understand it before any charges apply. We believe charges should be in both directions where Distributors are re-classifying category's either higher or lower than they should be.	
ENWL	<p>Yes – because this will incur abortive costs, especially if we are responding the too many cat A's this will increase the level of resources we need to make available at any time during normal working hours and may affect standby call out charges which start from 1630.</p> <p>Agreed – the % should be very small.</p>	Noted
GTC	Yes, we have evidence to suggest that this occurs fairly frequently at the moment and we believe that levying charges will act as an incentive to suppliers & their agents to improve their service.	It was noted that there may be perceived mis-reporting as IDNOs cover the whole country and different areas may have different practices. It was highlighted that the MOCOPA guidance document should ensure that the rules are applied consistently.
Northern Powergrid	Yes. We envisage certain scenarios where it is reasonable for a DNO to charge where defect reports are of a higher category than is actually the case. We have provided specific examples in our response to Q15. We note that the working group will need to agree which visits are chargeable once the threshold/trigger percentage has been reached or exceeded.	Noted
Npower	No. DCUSA does not contain any current charging arrangements. Any concerns relating to persistent mis-categorisation should be reported and progressed through an appropriate existing forum such as MOCOPA.	Working Group members discussed this comment and suggested that MOCOPA is not appropriate. It was also highlighted that DCUSA contains nearly all the existing charging arrangements between Suppliers and Distributors.

<p>ScottishPower Energy Retail Ltd</p>	<p>No – if there are training issues with the way the revised flow has been implemented these should be highlighted straight away and dealt with now. We would expect this to be a much reduced figure once the revised flow has been in use for some time.</p>	<p>It was highlighted that if all other Suppliers are managing issues whereas one or more is not then there needs to be an incentive to make suppliers perform better. DNOs need this to ensure that they are able to operate efficiently and to recover unnecessary costs. It would not be fair on the Suppliers that are performing well otherwise.</p> <p>It was suggested that Suppliers will be telling DNOs when they need them on site and there, therefore, has to be a mechanism for managing mis-reporting. There should be a mechanism for DNOs to recover the extra costs incurred.</p> <p>It was highlighted that DNOs could re-classify issues because they would get paid, in a similar way that Suppliers could mis-report to get issues dealt with quickly.</p> <p>It was queried what would happen if a DNO fails to turn up to an appointment; would there be a reciprocal arrangement where the DNO would reimburse the Supplier. In response it was noted that DNOs would need to reimburse the customer though the guaranteed standards in these circumstances.</p> <p>It was suggested that re-charging should only be in exceptional circumstances.</p> <p>It was suggested that if the charge is a deterrent for both parties but month after month the information is not fit for purpose then the charge should be invoked. There should be one the other</p>
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		<p>way too, if the DNO does not make appointments.</p> <p>It was suggested that naming and shaming may be better. However, the reporting would need to be very robust.</p> <p>It was then suggested that this may not be a big issue in reality.</p> <p>Attendees agreed the principle that Parties should be able to recover the costs above what they would reasonably expect but at the moment charging will not be encouraged under this CP. At the review period this will be considered.</p>
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	We believe that Distributors should have the right to charge in any situation where costs are incurred due to inaccurate information provision from other parties.	Noted
SP Distribution SP Manweb	Although SPEN 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, the reality of the situation is that it may turn into a time consuming exercise. It may be better if persistent non-compliance is dealt with at industry level via the appropriate governance mechanisms. This will be a learning curve for all involved and it may be better to look at this following implementation of the process once all parties are up to speed.	Noted
SSE Energy Supply	This seems acceptable	Noted

UKPN	No. Distributors should be entitled to levy charges for each situation reported by the Supplier, or its Meter Operator Agent, within the company's service area as a higher Category than is the case	Noted
Western Power Distribution	<p>The criteria should be modified to include circumstances where no defect is present, as well as those reported at an elevated category.</p> <p>As Distributors are effectively compelled to attend site when a Category A or B defect is reported, it is reasonable that there should be some safeguards against potential abuse by Suppliers and/or Meter Operators.</p> <p>However, if there are to be sanctions levied against Suppliers and/or Meter Operators, it is also reasonable that there should be some safeguards against potential abuse by Distributors.</p> <p>WPD supports the proposal (subject to the modification proposed in the first paragraph) because the charges are to be Transactional Charges, which Suppliers / Meter Operators have the right to dispute under DCUSA Schedule 4.</p>	It was noted that where no defect is present then this would be an aborted visit.
Question 14	14. Should this percentage be set at 15%? Please provide supporting comments.	Working Group Comments
British Gas	We would agree that 15% would appear to be reasonable	Noted
EDF Energy	The 15% specified within the straw man seems to be reasonable; however we would like to understand if there is any specific logic that has been used in determining this figure.	Noted
EON Energy	Before we can agree to a percentage we need to understand	Noted

	what the rollout volumes are likely to be. The working group should do some analysis on the volumes already published combined with the skill sets of the Distributors. Where DNO investment in skilled staff is low compared to their number of supply points this percentage should be higher to encourage proper investment in skilled staff.	
ENWL	Should be lower – what is the excuse for poor accuracy in reporting defects 1 - 2% would seem reasonable. 15% seems far too high, allowing 1 in 7 to be reported in error.	Noted
GTC	We do not feel this percentage is unreasonable however if it is based on the distribution service area then this could cause issues since an IDNO's DSA is different to a DNOs DSA. Therefore the volumes and percentages involved in this could be skewed with some distributors being able to levy charges more often than others even though the effect may be the same.	Noted
Northern Powergrid	Yes, we believe that this threshold is reasonable, however it may need to be reviewed when the rollout has commenced and the practical implications are realised.	Noted
Npower	No. Please see our response to Q13.	Noted
ScottishPower Energy Retail Ltd	No – see comments above.	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric	There should not be a percentage set. A Distributor should be able to charge in all instances where appropriate to do so.	Noted

Power Distribution plc		
SP Distribution SP Manweb	As per previous responses, we would like to see some analysis around the 15% figure.	Noted
SSE Energy Supply	This seems acceptable	Noted
UKPN	See response to Q13. All such jobs should be chargeable.	Noted
Western Power Distribution	WPD does not agree with the proposal. Any unwarranted report would result in an inefficient use of resources and needless expense for which there should be recompense. The percentage should be set to 0%.	Noted
Q14 Summary: Similar to the approach taken for other straw man values, the Working Group agreed that this value should be looked at during the post implementation review.		
Question 15	15. Are there any other scenarios which should also incur charges (for example, aborted visits)? Please provide supporting comments.	Working Group Comments
British Gas	Currently there are no penalties proposed against DNOs for failing to meet SLAs. However if a DNO makes an appointment with a customer but then fails to turn up then the supplier may also incur costs if they have arranged for an appointment to fit the meter shortly after the DNO appointment. We would propose that not only the customer but also the supplier should be compensated by the DNO for breaking an appointment.	It was agreed that this should be considered during the post implementation review.

EDF Energy	We do not believe that other circumstances, and specifically aborted visits, should incur charges. As Suppliers already do on a day to day basis, Distributors will need to make sure they are managing the relationship with the end customer/connectee is an effective way that ensures that the number of aborted calls is minimised, for example through the use of appointment reminders. Where the Distributor is doing this effectively the number of aborted calls should be very low, and would not need to incur a charge.	Noted
EON Energy	This may be appropriate. It will depend on why aborted visits are aborted (in this example). Is it due to DNO not sending the correctly skilled staff, as frequently happens now, not bringing the correct equipment or simply running out of time, We may wish to charge in these scenarios if our MOP has attended at the same time to fit the meter.	Noted
ENWL	If no work needs doing then the whole cost should be chargeable.	Noted
GTC	None that we can think of that would be reasonable	Noted
Northern Powergrid	<p>We envisage 3 scenarios where a DNO may wish to charge a supplier in relation to abortive visits:</p> <ol style="list-style-type: none"> 1. The DNO sends a rapid response operative to a Category A (safety) job and it turns out it is actually a category B or C job that needs a jointing team (this is a wasted rapid response visit). 2. The DNO sends a jointing team to a Category B (repair) on an agreed appointment and it turns out to be a Category C (this is a wasted visit because the Jointing team could have been 	Noted

	<p>attending a higher priority fault repair elsewhere).</p> <p>3. The DNO sends a rapid response operative or a jointing team to a Category A, B or C job and there is nothing wrong with our assets (this is a wasted visit, potentially due to insufficient training of the meter operative).</p>	
Npower	No. Please see our response to Q13.	Noted
ScottishPower Energy Retail Ltd	Yes – DNO to supplier charges if they cannot complete the job. Or DNO to customer, similar to Guaranteed Standards payments as the DNO has delayed the customer's change of meter due to problems with their network.	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	See Q 13 response.	Noted
SP Distribution SP Manweb	SPEN believe that aborted visits / refused access should incur charges as there will have been considerable time and money spent in the Engineer attending the premise. Although the issue will be who will pay the charge as the appointment will have been raised by the DNO and not the supplier. Additionally, DNO's do not necessarily have the functionality to be able to charge customers as there are no customer billing accounts set up.	Noted
SSE Energy Supply	Aborted 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 should be included.	Noted

UKPN	Abortive visits by the DNO, where the customer has agreed an appointment but not kept it or where there is no fault, should be chargeable to the supplier.	Noted
Western Power Distribution	WPD believes the following scenarios should also incur charges: (1) Reports where no defect is present (as per response to Q13) (2) 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	Noted
Q15 Summary: The Working Group agreed that this area should be considered during the post implementation review.		
Question 16	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? Please provide supporting comments.	Working Group Comments
British Gas	Yes we still agree that 10 days is reasonable	Noted
EDF Energy	We agree that these timescales are reasonable, however we believe that the definition of scheduled needs to be clear. This must mean that an appointment has been agreed with the end customer/connectee, this can not take the form of „deemed,, appointment whereby the Distributor has notified the customer that they will be attending at a specific time and telling the customer that they need to be there at that time. That is not an	Noted

	acceptable customer experience and would have a detrimental impact on the public perception of the smart metering rollout.	
EON Energy	Yes, this is good customer experience to know somebody will contact them to schedule the works that are preventing them gaining the benefit of having their smart meter being installed.	Noted
ENWL	Clarity sought, this does mean that the customer has been contacted within the 10 days say with an appointment programmed after that. 10 days may be too tight suggesting 10 WD.	It was confirmed that this had been discussed at a previous WG meeting and the principle of 10WD had been agreed.
GTC	Yes	Noted
Northern Powergrid	Yes, Northern Powergrid's view remains the same as their first consultation response.	Noted
Npower	Yes, we feel this is adequate time in accordance with industry practice.	Noted
ScottishPower Energy Retail Ltd	Yes this is reasonable.	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Yes we agree this is reasonable subject to the caveats as listed in the consultation where it would be deemed the Distributor has met the requirement.	Noted
SP Distribution SP Manweb	SPEN believe that it is reasonable that within 10 days of receipt of a D0135 that either a visit or a site survey should have been scheduled. This may not take place within 10 days, but the initial attempts to contact the customer and book the above should	Noted

	have taken place.	
SSE Energy Supply	This seems acceptable	Noted
UKPN	Yes this is acceptable.	Noted
Western Power Distribution	<p>WPD did not and does not believe that this proposal is reasonable.</p> <p>The meter exchange can only be carried out once the defect has been resolved and consequently the service level should focus on this end only.</p> <p>The Distributor would not know how complicated / 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.</p> <p>There is an inconsistency with the overall approach. If time is of the essence, why is it reasonable for Suppliers / MOPs to wait 10 working days before notifying the distributor of the defect?</p>	<p>It was noted that for most data flows 10wds is the industry standard backstop. Having the 10 WD requirement allows the Supplier to give the customer a view of when they will be contacted by the distributor. This will be important for the customer experience.</p> <p>It was suggested that due to the roll out numbers and the need to support the customer, if the appointments are not made quickly they are going to start stacking up.</p> <p>It was highlighted that MOPs with handheld devices will be able to send the flow to the DNO immediately whilst still on site. Smaller organisations may not be able to do this.</p>

Question 17	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). Please provide supporting comments.	Working Group Comments
British Gas	Yes we agree that the above process would demonstrate that the DNO has made reasonable endeavours. We would expect the DNO to keep some record of the attempts made to contact the customer should the customer complain to the supplier that no attempts had been made. We would be interested to know what success rates Distributors currently achieve when making appointments to rectify category B situations.	Noted
EDF Energy	<p>We believe that any definition of the reasonable endeavours that the Distributor should be required to undertake should be in line with similar requirements that exist for Suppliers in regards to contacting the customer in order to arrange for the smart metering install under the Supply licence. There is no mandated requirement but our understanding is that something like the following is likely to be adopted as a standard approach by Suppliers:</p> <p>1. Outbound Telephone call 1</p>	<p>It was noted that if this approach is used by Suppliers and the suggested approach used by DNOs then the customer would have been contacted 9 times.</p> <p>It was agreed that DNOs sending skilled staff to site where contact with the customer cannot be made would not be preferable due to the cost that this would incur.</p> <p>It was noted that once reasonable endeavours</p>

	<p>2. Outbound Telephone call 2</p> <p>3. Written Letter 1</p> <p>4. Outbound Telephone call 3</p> <p>5. Home Visit (leaving a contact card if no access)</p> <p>6. Final Letter</p> <p>There would also need to be defined times set between these steps to give the maximum chance of being able to contact the customer.</p> <p>We believe that such steps are reasonable for Distributors to undertake, especially given the nature and impact of the failure to resolve the situation that has been identified.</p>	<p>have been made, as far as the DNO is concerned the job is closed down.</p> <p>It was highlighted that DNOs will be working by geographic area and they may have some fill-in time between jobs where they could knock on doors. This would not be precluded by the SLAs but the Working Group would not want to place an obligation to do this.</p>
EON Energy	Yes it would be Helpful to have this defined if this is to be monitored accurately. We may also want to consider customers may wish to be contacted by text or email.	Noted
ENWL	<p>Yes – though for this to work we will need customers full contact details, name, address phone number etc.</p> <p>Some companies take an alternative number which often helps' the process</p>	It was noted that getting the correct information is to be included in the MOCOPA guidance document. It was highlighted that getting the best contact method and number to pass on to the DNO is important. For example, the free text box can say that the best way to contact the customer is via this email address.
GTC	Yes	Noted
Northern Powergrid	Yes, we believe the reasonable endeavours described above to be fair.	Noted

Npower	Yes, we feel this is adequate time in accordance with industry practice.	Noted
ScottishPower Energy Retail Ltd	Yes – but it has to be clarified what is meant by “met the service level”. Does this mean the job is closed down and as such requires another D0135 or is the job still open and attempts being made to complete it?	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Yes this is a reasonable proposal provided that the contact details are provided by the Suppliers or their agents in the D0135 flow.	Noted
SP Distribution SP Manweb	We agree that reasonable endeavours will be made to contact the customer to agree an appointment with the customer. Working hours contact is possible, although contacting customers outside of working hours will require a change in FTE as we currently do not have clerical staff that work outside working hours. We believe reasonable endeavours would be a call in working hours and a letter sent to the premise.	Noted
SSE Energy Supply	This seems acceptable	Noted
UKPN	These are acceptable. Whatever is agreed by the Working Group should be documented in 1.7 of Schedule 23.	Noted
Western Power Distribution	WPD does not agree with the definition of Working Hours (see response to Q1 above). WPD does 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.	It was noted that category A situations are different in that there are safety related regulations on top of the DCP 153 SLAs. It was noted that the assumption is that if it is a category A situation then the DNO will be able to

	It is likely that Meter Operators will not remain on site for some Category A situations, which means that Distributors will have to contact the Connectee in order to gain access to the premises. It is possible that the DNO will not be able to agree an appointment with the Connectee (for example, because they only agreed to take 2 hours off work and that goodwill was exhausted for the Supplier / MOP visit) and consequently the "reasonable endeavours" ought to apply to both Category A and B situations.	get in because the customer will have been told that there is a risk to their property. It was highlighted that DNOs have rights to gain entry to make safe including getting a locksmith if needed. The Working Group agreed to leave the straw man as it is presently and review post implementation to see if such a situation has occurred.
Question 18	18. Do you have any further comments on the Network SLAs as defined in the straw man document? Please provide supporting comments.	Working Group Comments
British Gas	n/a	Noted
EDF Energy	We believe that the DCUSA should additionally state that "The SFIC will provide an incident reference number for every category A issue to the operative making the call, at the time of that call." We are having difficulty getting this on a consistent basis currently, and it is causing the MOP issues as it requires follow-up in order to be able to keep track of faults raised.	It was noted that the reference number may just be the MPAN. It was noted that the MOCOPA guidance document discusses this. It was highlighted that no DNOs currently does not give an issue number, therefore, this is not an issue at present.
EON Energy	No.	Noted
ENWL	No	Noted
GTC	No	Noted
Northern Powergrid	Overall, the Straw Man document provides an effective summary of the key points of the SLA. The number of report parameters and categories seems excessive. If possible, the	It was noted that in relation to the SLAs Northern Powergrid are happy overall but they have

	Working Group should consider simplification of the report categories etc., as this would help end users to comply with their reporting requirements.	concerns around the reporting.
Npower	No further comments.	Noted
ScottishPower Energy Retail Ltd	Category A – will a DNO make the site safe outwith working hours? The SLA is unclear. Appreciate the fault may have to be fixed within working hours. Current wording could lead to the assumption that a DNO is accepting responsibility if something goes wrong once the fault is reported?	It was noted that this is not a common event.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	None at this time.	Noted
SP Distribution SP Manweb	No further comments.	Noted
SSE Energy Supply	No	Noted
UKPN	No	Noted
Western Power Distribution	<p>(1) We seem to have ended up in the slightly ludicrous position where the only obligations on the Distributor are to make appointments with the Connectee. There is no obligation to actually resolve anything within a particular timescale.</p> <p>(2) We seem to have ended up in the position where the SLA for each Situation is made up of a number of separate parts (e.g. Category B Situation has three parts a, b & c) and yet</p>	<p>It was agreed that the straw man document should be updated to remove 'with a view' from the Category B SLA requirement. Action</p> <p>It was noted that it has been agreed against an earlier question that category A situations should not revert to category B situations.</p> <p>It was highlighted that the contact details are in a</p>

	<p>performance is being reported / judged for each individual element rather than for the SLA overall. The meter exchange can only be carried out once the defect has been resolved and consequently the reporting / judging of performance should focus on this end only, rather than on some of the other (trivial) constituent parts.</p> <p>(3) Category A SLAs should apply to Category A Situations only. Likewise Category B SLAs should apply to Category B Situations only. It is not acceptable for a Category B SLA to suddenly be applied to a Category A Situation midway through the process. The last sentence in Part 1: Clause 1.1 should be deleted.</p> <p>Whilst WPD would prefer not to cater for the scenario where a Category A Situation was not dealt with during the initial visit, if the consensus view is that it ought to be then the Category A SLA should be split into two parts, a) and b) respectively. The former should deal with the requirements for the initial visit. The latter should state something to the effect “The situation should ideally be remedied during the initial visit. If this is not possible then it should be remedied within 40 Working Days”.</p> <p>(4) The requirements for Category A Situation presume access will be automatically granted by the Connectee. This may not necessarily be the case, especially where the meter operator has left site. (See response to Q17)</p> <p>(5) The SLA does not state what should happen in the case of a Category B situation where Connectee contact details have not been provided in the data flow.</p> <ul style="list-style-type: none"> • This information is a non-compulsory field in the 	<p>non-compulsory field so the flow cannot be rejected if they are not received. It was noted that the address is always received as it is compulsory.</p> <p>It was suggested that if a DNO is receiving poor information from a particular Supplier then they will contact that Supplier directly.</p>
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	<p>data flow</p> <ul style="list-style-type: none">• Should the defect be disputed?• Should the company be deemed to have met the service level? <p>(6) In WPD's opinion there should be no requirement to notify Suppliers and Meter Operators of the appointment date / alternative appointment date / non-agreed appointment by dataflow.</p> <p>A D0126 data flow is not suitable for sending this time and date information in its current form (This information is outside the scope of the current data flow, which only permits notification of resolution or dispute). It could be modified or a new data flow could be created specifically for this purpose (the latter would be more preferable).</p> <p>Irrespective of which option is chosen, it will entail system changes for both DNOs, Suppliers and MOPs, which would take time to implement. It would also be necessary for other organisations (MRA, MOCOPA etc) to consult and agree to these changes before they could be implemented.</p> <p>WPD has only recently completed the necessary system changes to implement revised D0135 and D0126 data flows (came into effect on the 10th December). There is no appetite for repeating this exercise for a second time.</p>	
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Question 19	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? Please provide supporting comments.	Working Group Comments
British Gas	We agree with the proposal to liaise with the MRA to determine how arrangements can be amended to allow the valid set of Asset Condition Codes to be documented in the DCUSA rather than the MRA. However we note that governance for this area of activity already sits across several codes including DCUSA, MRA and MOCOPA and would not have an issue if the valid set of Asset Condition Codes remained in the MRA. Distributors are party to the MRA and will be aware if changes are proposed to the valid set which impact on the DCUSA SLAs.	Noted
EDF Energy	We agree with this approach, ultimately we need to find the solution that ensures that the valid set is owned by the party that has the most expertise in this area, and which allows for changes to that valid set to be made in an effective timely manner with the engagement of the right constituency of interested and affected parties.	Noted
EON Energy	We don't believe this is necessary. All parties are signatories to both DCUSA and the MRA and the change process under the MRA and DCUSA are robust enough to ensure that any amendments to these codes in the future would not be made without the DCUSA being aware. The MRA send a representative to all DCUSA Panel meetings, who reports on all changes that may have an interest to DCUSA. There is also a similar	Noted

	arrangement for DCUSA to report back to MDB.	
ENWL	Yes	Noted
GTC	We would question whether this necessary? A DCUSA representative is usually in attendance at various MRA meetings and it would be widely accepted that this would affect DCUSA should a CP be raised.	Noted
Northern Powergrid	Northern Powergrid has no strong opinion on this, but the management of a valid set of Asset Condition Codes in one place would be preferable, as this will aid clarity and consistency	Noted
Npower	The MRA DTC holds the valid set of asset condition codes and is under a formal and well supported change control mechanism. For the purpose of this consultation we recommend the asset condition codes remain within the MRA, and appropriately cross-referenced in the Service Level.	The Working Group noted that the MRA formal change process means that if there is to be a change to the valid set then the industry would be informed.
ScottishPower Energy Retail Ltd	Can understand the reasoning for this but have to be very clear within MRA that this has been done to avoid any issues / misunderstandings for new market entrants.	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	We believe it is totally inappropriate and unnecessary to have the Asset Condition Codes anywhere other than the MRA. This would set a new precedent and as stated before DCUSA is not an all-embracing process document. This would increase the burden of change as any amendment to Asset Codes would need to go through both the DCUSA change process and the MRA change process as the code is a defined 'J' item in the data transfer catalogue.	Noted

SP Distribution SP Manweb	n/a	Noted
SSE Energy Supply	Yes, to prevent SLA performance being affected from changes in a set of codes outwith DCUSA control	Noted
UKPN	<p>Yes. The service levels should not be in a different contract to the services.</p> <p>It should be noted that the DTC does not list all valid sets for every data item. Some cross reference MDD. Others are descriptive. Some are open to any value but are limited by external factors e.g. system voltage, meter ID.</p> <p>In this case the valid set could be “any within the constraints of the format” and DCUSA could then be used to define the codes. In this way the parties agree the values outside of the MRA but in doing so limit the range of valid values.</p> <p>This is no different to other items whose values are agreed between parties outside of the MRA but which values are limited by the parties’ agreement, such as “contract reference”. Parties can validate flows against the valid set they know between them, even though that valid set is not given in the DTC, and can reject flows quoting invalid values.</p>	Noted
Western Power Distribution	<p>WPD does not agree with this approach.</p> <p>The Asset Condition Codes were agreed by MOCOPA Panel and proposals to make changes to them should be agreed through MOCOPA. DCUSA should not be responsible for the codes.</p> <p>WPD believes the concerns that changes to the codes via the MRA could occur without due consideration being given to the</p>	Noted

	<p>impact on DCUSA are unfounded. It would require every MRA Change Administrator and every MDB member to “forget” that other agreements could be impacted by such a change for a change to go through without somebody saying “what about the DCUSA impact?”. Also, DCUSA is entitled to attend MDB meetings where any changes are discussed which provides another opportunity for somebody to realise there is a DCUSA impact. In our experience the different code administrators also provide good protection in this area and are adept at identifying changes in one code that impact on another.</p>	
<p>Q19 Summary:</p> <p>It was noted that there was a seven to five majority in favour of moving the valid set into DCUSA . The Working Group agreed 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.</p> <p>Action</p>		
Question 20	20. Do you believe that Distributors should report at an industry level or Supplier level? Please provide supporting comments.	Working Group Comments
British Gas	Our preference would be for reporting to be a supplier level. This will enable us to see the performance being achieved for our customers.	Noted
EDF Energy	We believe that Distributors should report at both an Industry and Supplier level; however we believe that Supplier level reporting should only be visible to the individual Suppliers. We would recommend a similar model as has been used in the past for Elexon peer comparison reporting where the individual Supplier IDs are anonymised on the report, and each Supplier is separately notified as to which of the IDs on the report is theirs.	Noted

	This allows Suppliers to understand their performance in regards to situations reported by their Agents relative to other Suppliers, without then identifying which Suppliers.	
EON Energy	I believe it is sufficient to report at industry level. However individual failures to meet SLAs should be reported to those suppliers individually when they occur.	Noted
ENWL	Both – as supplier behaviour can skew performance, but overall industry performance is important benchmark. This will also allow us to identify if we are having issues with one particular supplier.	Noted
GTC	It depends on how reporting is developed, if it is developed centrally then there is no reason why this could not be both however we would recommend that only one choice should be chosen should the distributors be completing this work individually. We have no preference for on level of reporting.	Noted
Northern Powergrid	We believe that formal reporting should be at industry level, but DNOs may also opt provide supplier level reports on a bilateral basis to suppliers on request.	Noted
Npower	At both levels with appropriate controls on access	Noted
ScottishPower Energy Retail Ltd	Happy for it to be at an industry level. The DNO would have access to the supplier split and could contact them individually if there are any concerns.	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric	We prefer to provide reports to each Supplier as the originator of the request for remedial works to be carried out.	Noted

Power Distribution plc		
SP Distribution SP Manweb	SPEN believe that Distributors should report at both an industry and supplier level. This will allow for adequate benchmarking. The industry level report should filter down to the Supplier level.	Noted
SSE Energy Supply	Both, for overall performance and to ensure that consistent service is being delivered to all suppliers	Noted
UKPN	<p>We believe that the service levels should apply across all suppliers rather than to each individual supplier (may need carefully wording in the legal text).</p> <p>If we wish to report for our own purposes by supplier in order to discuss and improve performance by a given supplier then we can do so internally and discuss with them directly. Publishing the relative performance of suppliers on the DCUSA website adds no benefit to us.</p> <p>If reporting is to be done by supplier then a total column should be added at the end and those rows which calculate a percentage should only be calculated for the total column.</p>	Noted
Western Power Distribution	<p>WPD assumes the question means should Distributors report overall totals or sub-totals for each Supplier.</p> <p>WPD believes Distributors should report overall totals as the service level obligations are based on overall figures rather than on a per Supplier basis. It is unclear what (if any) benefit is gained from more detailed reporting.</p>	Noted
Q20 Summary: It was noted that there was a nine to seven split in favour of industry level reporting . An action was taken to update the straw man document		

accordingly. Action		
Question 21	21. Reporting item (p) 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? Please provide supporting comments.	Working Group Comments
British Gas	We do not have any issues with putting in place reporting on this issue. We would expect to receive this type of feedback as part of the business as usual activity of the DNO in any case.	Noted
EDF Energy	<p>We strongly believe that consideration of reporting of these situations within the reporting framework for these SLAs is not appropriate.</p> <p>The quality of work undertaken by the Meter Operator when installing a smart meter has nothing whatsoever to do with the SLAs for Distributors to resolve issues that are preventing a smart meter install. Any such reporting, if it is felt that it is required, must be progressed as a separate change proposal as it is unrelated to the change being discussed here.</p>	Noted
EON Energy	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.	It was noted that this would capture both ends of the debate. It was highlighted that screening on the phone will not always give a full indication of the situation.

ENWL	<p>Only if the failure has occurred as a result of the work carried out by the MOP – otherwise it is not relevant to the SLA.</p> <p>Yes – in order that we can identify either faulty workmanship or product issues. Not sure that one month is enough time though – 12 months would seem reasonable.</p>	Noted
GTC	Yes, we believe that suppliers will probably want to analyse this data in order to improve their smart delivery roll out.	Noted
Northern Powergrid	We recognise the potential issues with faults subsequent to smart metering installation; however we believe that this is actually outside the intent and scope of Change Proposal DCP153. DNOs could record data on installation quality, including any resulting safety concerns and share the information with suppliers bilaterally	It was noted that there is a feedback loop that will ensure that quality issues are fed back.
Npower	Yes, we agree.	Noted
ScottishPower Energy Retail Ltd	No – not relevant to this change. A DNO would be charging for this visit anyway so a supplier will quickly be able to see any issues.	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	We support reporting post installation issues to individual Suppliers	Noted
SP Distribution SP Manweb	SPEN believe that the SLA reporting should include reporting on failures post smart metering installation. This will allow for potential high level auditing of smart meters installed.	Noted

SSE Energy Supply	Yes	Noted
UKPN	<p>It may be helpful to the industry to understand the quality of installations/equipment given the mass nature of the roll-out, if corrective action is needed to be taken to prevent further issues.</p> <p>Note that reference in the Schedule, item P, should be to a “perceived distribution fault”.</p>	It was agreed that the Item P reference in the straw man should be updated accordingly. Action
Western Power Distribution	<p>WPD agrees with the principle of reporting on failures post smart metering installation, but has reservations about the proposal as it currently stands, specifically with the “within a month” requirement.</p> <ul style="list-style-type: none"> • It is an overly narrow “warranty” period • A distributor would not know when this period commenced or ceased without having to do a lot of administrative work (e.g. searching through D0303 dataflows etc) 	It was noted that there will be a label on the meter to say when it was exchanged. It will also be in the D0150 flow.
Question 22	22. Do you have any further comments on the Distributor reporting requirements as defined in the straw man document?	Working Group Comments
British Gas	n/a	Noted
EDF Energy	As detailed in our responses to previous questions we have a concern that situations that are not resolved within the SLAs are not tracked through. We believe that there should be additional reporting that reports on those incidents that are not resolved within the SLAs but are resolved within the following period, and those incidents that are not able to be resolved within this	It was noted that this was discussed against previous questions

	additional timescales as well.	
EON Energy	No	Noted
ENWL	No	Noted
GTC	No	Noted
Northern Powergrid	Please see our answers to questions 11, 12 and 18.	Noted
Npower	We would see value in a report that shows performance where Network Operators are unable to arrange appointments with connectee situations, as a percentage of total Cat B jobs raised by the Supplier or its Agent. See our response to Q17	It was noted that DNOs will be telling Suppliers where they have failed to make an appointment. The information is therefore available.
ScottishPower Energy Retail Ltd	No	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	We would prefer to see reporting between individual Distributors and individual Suppliers.	Noted
SP Distribution SP Manweb	No further comments	Noted
SSE Energy Supply	No	Noted
UKPN	No	Noted
Western Power	(1) Part 3: Clause 3.1 refers to clause 30.5.7. Shouldn't this be	It was noted that these comments have been

Distribution	<p>30.5.A?</p> <p>(2) WPD would like the reporting requirements to be modified in line with the response to Q3 i.e. based on the total number of Category A & B situations <u>reported</u> in the month, the number of these that were visited and rectified within the service level both as a total and a percentage.</p> <p>(3) WPD does not agree with requirement to report Category B Situation Appointments.</p> <p>(4) WPD does not agree with the Incorrect Categorisation reporting requirements as they are excessive and do not include an option for “no defect is present”. WPD suggests that these are changed to the number of Category A & B situations reported in the month which were disputed.</p> <p>(5) We seem to have ended up in the position where the SLA for each Situation is made up of a number of separate parts (e.g. Category B Situation has three parts a, b & c) and yet performance is being reported / judged for each individual element rather than for the SLA overall. The meter exchange can only be carried out once the defect has been resolved and consequently the reporting / judging of performance should focus on this end only, rather than on some of the other (trivial) constituent parts. (See response to Q18 also).</p>	covered against previous questions.
Question 23	23. Do you have any comments on the Supplier reporting requirements as defined in the straw man document?	Working Group Comments
British Gas	n/a	Noted
EDF Energy	We have no additional comments on the Supplier reporting requirements.	Noted

EON Energy	No	Noted
ENWL	No	Noted
GTC	No	Noted
Northern Powergrid	No	Noted
Npower	We do not have any current plans to report to Postcode Outcode level. We report our Smart meter install forecasts regularly to DECC split by key deployment phase and DNO region.	Noted
ScottishPower Energy Retail Ltd	As above – do not believe it should be driven by smart metering. These are existing faults on the network that have to be fixed.	It was noted that Scottish Power has a general issue with the change in that it is operational work, the faults existed already and have not been created by the smart work.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Please see response to Q10.	Noted
SP Distribution SP Manweb	It would be better if the Supplier reporting requirements could be more detailed. DNO's require detailed information on post codes to allow them to focus proactively on potential FTE requirements depending on the housing stock targeted. The level of detail proposed will not offer the best opportunities for DNOs to work in connection with Suppliers.	It was noted that this was discussed against previous questions
SSE Energy Supply	No	Noted

UKPN	Write “months” in T4-6 and T7-12.	It was agreed that the straw man should be updated accordingly. Action
Western Power Distribution	<p>(1) The reporting requirements for Suppliers are confusing and contradictory. Clause 30.5A.2 calls for quarterly reports, Part 4 Clause 4.1.A calls for annual forecasts updated annually, Part 4 Clause 4.1.B calls for bi-annual forecasts updated quarterly, and the table requires rolling totals.</p> <p>WPD suggests Part 4 Clause 4.1 is worded along the following lines “The User shall produce a report in accordance with Clause 30.5A. The report shall provide the User’s latest best forecast of electricity smart meter installation by Distribution Licence Area and Postcode Post Town & Outcode.”</p> <p>(2) Part 4: Clause 1.3. Shouldn’t it be clause 4.2?</p> <p>(3) Part 4: Clause 1.3. There is a note above the table which states T = Current month + 3. There are then references in the table to T+1 month etc. It would be less confusing if T = current month and the references in the table were amended accordingly i.e. Column 2 changed to T+3 months, Column 3 changed to T+4 months, Column 4 changed to T+5 months, and so on.</p> <p>Columns 7-12 infer rolling totals. WPD suggests that instead of using T+1 year, T +2 years etc, the calendar year is used instead i.e. 2014, 2015 etc.</p> <p>(4) The reporting requirements relate solely to the smart meter rollout and consequently will not endure beyond this project. WPD wonders if it appropriate to include a cessation date in the requirements.</p>	It was agreed that the straw man should be updated accordingly. Action

Question 24	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.	Working Group Comments
British Gas	n/a	The Working Group agreed that all values should be reviewed post implementation.
EDF Energy	As noted in our answers to previous questions we believe that the percentage values and timescales detailed in the straw man document appear to be reasonable, we would be interested to understand how these figures have been arrived at, and whether this is to try and obtain consistency with other related standards or measures.	Noted
EON Energy	Only as previously noted.	Noted
ENWL	No	Noted
GTC	No	Noted
Northern Powergrid	No.	Noted
Npower	Under Q4, we would wish the forecast volume threshold to be set at 20% or more	Noted
ScottishPower Energy Retail Ltd	See previous comments.	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric	See responses to Q3 and Q4 - we do not support the proposed 15% hurdle and propose 10% as a more reasonable and balanced alternative.	Noted

Power Distribution plc	See also responses to Q13 and Q14 – we do not support application of any percentage in this context.	
SP Distribution SP Manweb	As stated above, we require further clarification on the percentage figures discussed above.	Noted
SSE Energy Supply	n/a	Noted
UKPN	15% before charging. See previous responses.	Noted
Western Power Distribution	<p>WPD does not support the following:</p> <ul style="list-style-type: none"> (1) The service level to be met on 90% of occasions. Alternative values and reasoning is included in the response to Q2 (2) For the SLA obligation to be released for volumes in excess by 15%. Alternative values and reasoning is included in the response to Q4 (3) For reports to be prepared and sent to the DCUSA Secretariat within 15 days of the end of each month. Alternative values and reasoning is included in the response to Q9 (4) The levying of charges where the number of reports is above a set amount. Alternative values and reasoning is included in the response to Q14 (5) For Category B visits to be scheduled within 10 days of receipt of the D0135 flow. Reasoning is included in the response to Q16 (6) Notifying the User and the Meter Operator of the agreed appointment date / alternative appointment date / non- 	Noted

	<p>agreed appointment within 10 Working Days of agreeing it. Reasoning is included in the response to Q18</p> <p>(7) The “within one month” requirement for reporting on failures post smart metering installation. Reasoning is included in the response to Q21</p>	
Question 25	25. Do you believe that DCP 153 should introduce any reporting requirements in relation to Category C situations? Please provide supporting comments.	Working Group Comments
British Gas	We do not believe there is any requirement to report on category C issues as these have not been included within the scope of the original change proposal	Noted
EDF Energy	<p>As noted in our previous consultation response, while we recognise that category C situations do not need to have SLAs associated with them as they do not prevent a meter installation, we would be concerned that if left unresolved these situations could be needlessly re-reported should a subsequent site visit take place.</p> <p>We would recommend that the 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, for example, less than 6 months, between 6 months and year etc. As Distributors have asked for Suppliers and their Agents to provide information on these situations, we believe that there should be visibility of how effectively Distributors are reacting to the information they are provided.</p>	Noted
EON Energy	The only reporting we see that may be useful would be the total	Noted

	number of Category C faults reported to a DNO. From this we 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.	
ENWL	No	Noted
GTC	No, this is not necessary.	Noted
Northern Powergrid	No. As the supplier's rollout plans are unaffected by Category C situations we believe that reporting requirements for such jobs are unnecessary.	It was noted that after the next price control period there may be increased work on category C instances. This is because there will be numbers of trained staff after the smart roll out has occurred.
Npower	We believe a high level count of Cat C situations raised in each Distributor region would be useful information to provide context to set Cat A and Cat B situations and volumes against. As Cat A and B situations volumes decline over time, as they are addressed, we would expect Cat C volumes to rise proportionally, and these may contain repeated situation reports.	Noted
ScottishPower Energy Retail Ltd	Happy without them.	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	We do not believe that management information reports should be required, but this must not be misinterpreted as relieving obligations to report Cat C situations to Distributors.	Noted
SP Distribution	SPEN do not believe that DCP 153 should introduce any	Noted

SP Manweb	reporting requirements in relation to Category C situations as this is for information purposes only. If required DNO's can report via dataflows received although the benefit of this is questionable.	
SSE Energy Supply	No, Cat C reports are a gift to the network operator who can choose to deal with them in their own timetable	Noted
UKPN	No. The rectification of these does not trigger works by the supplier or his agents.	Noted
Western Power Distribution	No. Category C defects do not affect any party to the DCUSA other than the Distributor and consequently it is reasonable for the Distributor to self-determine how to best manage those assets, and over what timescales.	Noted
Question 26	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?	Working Group Comments
British Gas	We believe there may be some merit in pursuing centralised reporting on performance. We acknowledge that not all of the performance levels could be reported in this way but a centralised system may enable some higher level reporting to be put in place whilst DNOs develop their own reporting systems.	It was suggested that that centralised reporting could be a fall back. If DNOs believe that they need time to implement system changes then it could be used as an interim solution until DNOs could update their own systems. It was noted that centralised reporting would not give the full set of information.

EDF Energy	<p>We believe that the reporting should be the responsibility of individual market participants but as noted in the answers to previous questions, that the reporting requirements must be very clear and are not subject to interpretation.</p> <p>While in theory centralised reporting would address this issue, only using the data supplied in dataflows across the DTN does not allow those flows to be viewed in context and legitimate circumstances (such as force majeure) accounted for. We believe that, unless these issues can be effectively addressed, that centralised reporting is likely to give an inaccurate picture of actual Distributor and Supplier performance, which could lead the reporting to not be used as it is not regarded as being accurate.</p>	Noted
EON Energy	This should be the responsibility of individual parties. It is not possible for centralised reporting to capture the exceptions that prevent SLAs being met. Therefore it should fall on individual parties to complete reporting.	Noted
ENWL	No comment	Noted
GTC	Centralised reporting would be an efficient use of the systems we already have at our disposal however this would not work if category A situations are not backed up with a data flow as distributors would still then need to input into the report individually. We think that depending on the costs this would be the ideal solution but we would not be against individual reporting.	Noted
Northern Powergrid	Northern Powergrid believes that performance reporting should be the responsibility of individual market participants.	Noted

Npower	There is a need to enable the DCUSA Secretariat to invoke an escalation process, by certain deadlines, to request missing / late reporting from all parties.	Noted
ScottishPower Energy Retail Ltd	Should be each DNO as they must be providing these reports internally anyway.	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	We do not support a centralised reporting offering as this is the responsibility of each individual participant. We do not see centralising as being necessary and have difficulty understanding how all the elements that are involved in meeting the SLA could be reported centrally.	Noted
SP Distribution SP Manweb	SPEN believe that the Working Group should pursue a centralised reporting line of enquiry on performance against the SLAs for consistency and accuracy.	Noted
SSE Energy Supply	Centralised	Noted
UKPN	This is a matter between parties and centralisation is not required.	Noted
Western Power Distribution	WPD believes that centralised reporting should be pursued.	WPD clarified that they had mis-interpreted the question as being about centralised publication. The attendee clarified the reporting preference would be individual participants to generate their own reports.
Q26 Summary: It was noted that the majority preference is for individual reporting.		

Question 27	27. Do you have any further comments?	Working Group Comments
British Gas	n/a	Noted
EDF Energy	We have no further comments.	Noted
EON Energy	We are concerned with the current working practices employed by DNOs that are receiving D0126 flows. We are seeing DNOS that are not responding at all to any codes including twenty that are A's. Other DNOs are rejecting flows incorrectly and are also referring to the draft ENA guidance document as having been accepted by industry. Without the swift implementation of these SLAs we are not convinced that DNOs will act upon any of these flows and thereby hold up the efficient roll out of Smart metering. We believe the SLAs should be implemented without further delay and reporting can follow at a later date.	Noted
ENWL	No	Noted
GTC	We believe that it may be helpful for distribution businesses to receive a corrective action report from suppliers and/or their agents. We still feel that category A situations should be backed up with a data flow in addition to the telephone reporting we receive.	It was queried whether this comment is referring to producing a report stating what action the Supplier has taken to ensure that mis-reporting does not continue.
Northern Powergrid	No.	Noted
Npower	The working group have produced a very comprehensive proposal and we fully support the delivery of a Service Level	Noted

	Agreement framework through the DCUSA arrangements.	
ScottishPower Energy Retail Ltd	None	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	None at this time.	Noted
SP Distribution SP Manweb	No further comments.	Noted
SSE Energy Supply	No	Noted
UKPN	The Clause numbering needs reviewing in the strawman.	Noted
Western Power Distribution	<p>(1) The wording of clause 30.5.2 is such that D0135 data flows are to be used for circumstances other than reporting category B or C situations, which is not appropriate. In other words it should be re-worded as follows "... and is either a Category B Situation or a Category C Situation".</p> <p>(2) The wording of clause 30.5.2 would not preclude a Supplier / MOP from accumulating defects (for up to 10 days) and submitting them in a block. An approach like this should be discouraged / prohibited.</p> <p>(3) Clause 30.5 There are a number of paragraph numbering errors i.e. two clauses numbered 30.5.5 and 30.5.6</p>	<p>It was noted in relation to point 2 that staff for larger Suppliers will have hand held devices allowing them to send defects from the site. For smaller Suppliers where this may not be possible.</p> <p>It was agreed that the straw man document should be updated in line with the suggestions in points 1 and 3. Action</p>