

**DCUSA DCP 153 Consultation Responses – Collated Comments**

<b>Question One</b>	<b>Do you understand the intent of the CP?</b>	<b>Working Group Comments</b>
AMO	Yes	Noted
British Gas	Yes we understand the intent of the CP	Noted
EDF Energy	<p>EDF Energy fully understands the intent of this change proposal.</p> <p>In the context of a high volume smart metering rollout programme we believe that it is of paramount importance to resolve any issues that might impact on that rollout in a way that ensures that the disruption to customers and to market participants is minimised.</p> <p>Creating service levels for the resolution of those issues will ensure that not only will Suppliers be able to manage their rollout programmes in an efficient way, but that it will be possible to set and meet expectations with the customer who may not have been able to have a new meter installed as a result of the issues identified by the Meter Operator.</p>	Noted
ENWL	Yes	Noted
EON Energy	Yes	Noted
GTC	Yes	Noted
Northern Powergrid	Yes, Northern Powergrid remains supportive of mechanisms to support a smooth roll-out of smart meters.	Noted
Npower	Yes	Noted
SP Manweb Plc and SP Distribution Ltd's	SPEN understands the intent of DCP 153 as it seeks to implement SLA's around Category A and Category B issues identified as part of a smart meter installation.	Noted
SSE Energy Supply Ltd	Yes	Noted
SSEPD	Yes	Noted
UKPN	Yes	Noted
Western Power	yes	Noted

Q1 Summary: The Working Group noted that all respondents understood the intent of the CP.		
Question 2	Are you supportive of the principles of the CP?	Working Group Comments
AMO	Yes	Noted
British Gas	Yes we are supportive of the principles of the CP	Noted
EDF Energy	EDF Energy is fully supportive of the principles of this change proposal. As a company that places health and safety at the centre of everything we do, we believe that a robust and consistent process for the timely resolution of issues that might impact on the health and safety of our customers and our staff is absolutely necessary.	Noted
ENWL	In general – yes. However, this consultation process is weakened in that there is no assessment of the projected volumes of work. This is fundamental to determine the response to many of the questions raised. We would expect these projections to be obtained from suppliers and communicated to us prior to this being taken further. Our main concerns are that we do not know the role out numbers, timings and geographical locations which makes the distribution activity difficult to scope. Additionally the funding of this activity also needs to be addressed pre and post 2015.	<p>It was noted that the respondent's comment regarding projected volumes is reflected in several other consultation responses.</p> <p>The Working Group noted that DECC had published very high level details on volume of work planned. It was suggested that the volumes of staff required could be plus or minus 10% and the smart programme timescales may potentially be pushed back. It was noted that it is difficult for DNOs to plan in light of this.</p> <p>It was further noted that organisations need to work together in forums such as DCP 153 to share information to facilitate the smart roll out.</p> <p>It was highlighted that gas first installations could uncover electricity network defects; therefore, information on gas meter roll outs would also need to be provided.</p> <p>It was noted that analysis on the volume of faults currently reported has not been provided by all network operators. It was suggested that it would be useful if market participants that have information on the proportion of faults found were</p>

		<p>to share this information.</p> <p>It was suggested that the DNOs could help the energy suppliers deliver an effective roll out if the Suppliers provide DNOs with roll out plans to aid them in building their plans. It was noted that this would require the industry to share data.</p> <p>It was noted that the MPAN id numbers can give a clue as to how old the metering system is, for those DNO areas where they have been raised in sequence. For instance, you would not expect a cast iron box on a MPAN that is only a few years old. This can aid in determining whether an intervention is likely to be needed.</p> <p>It was highlighted that there is lots of data out there such as census data, installation dates and also local councils may have data on issues encountered. This could aid DNOs by giving them insight into the likelihood of issues being encountered during the roll out. It was noted that with the volume of meter changes coming through this information would be useful.</p> <p>It was suggested by some group members that with a new work force of meter fitters there is likely to be some short falls, leading to an increase in post-smart metering DNO call outs. There was also a view that the new work force could be highly trained. The group agreed that needs to be accounted for too.</p> <p>It was noted that determining volumes are outside of the scope of DCP 153; however, the Working Group agreed that it was worthwhile capturing these points. It was agreed that if funding is not available then DNOs will not be able to meet the</p>
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		SLAs in a sensible way.
EON Energy	We are fully supportive of the principles of the CP. It is crucial to the successful roll out of Smart metering that Suppliers are able to understand how quickly issues that are preventing a meter being fitted and that require some work by the Distributor will be resolved. At present there is no incentive on Distributors to fix problems in a timely fashion. We believe it is also an obligation for Suppliers under SMICoP to keep customers informed of the status of a job.	Noted
GTC	Yes	Noted
Northern Powergrid	<p>Yes, however we feel that the proposed change should be on a more reciprocal basis to address more of the DNOs likely issues and reasonable requirements. We therefore believe that there is more work to be done by the working group, including :</p> <ul style="list-style-type: none"> <li>• The addition of a force majeure clause that would include an allowance for major network incidents;</li> <li>• The definition of what is meant by a major network incident;</li> <li>• The change and SLAs should recognise that some DNO works will be subject to third party consent and there should be recognition that where this is the case, alternative standards may apply;</li> <li>• The SLA should be subject to appropriate and timely smart meter installation programme forecasting from suppliers.</li> </ul> <p>Submission of data flows for category B and C works should be timely and frequent, seeking to avoid unnecessary 'waves' of work coming through from suppliers potentially batching-up field reports.</p> <p>This list is not exhaustive and there may be additional items to be addressed that will become clearer as the SLA is developed.</p> <p>DNO resource requirements for defect resolution would be driven by supplier smart roll-out activity. Suppliers should provide activity volume forecasts in advance and on a periodic and geographical basis. Failure to provide such forecasts, or where actual activity deviates substantially from the forecasts, should result in suspension of the SLA for the supplier(s) in question.</p> <p>We note that the proposer has raised this as a part 1 matter such that the change will be subject to Ofgem approval or rejection. We would hope that Ofgem rejects</p>	<p>See above response to ENWL for discussion on forecasts.</p> <p>The Working Group noted that there is some reciprocal reporting planned.</p> <p>In relation to the first bullet point, it was noted that there is already a force majeure clause within the DCUSA. It was agreed that an action should be taken to check with lawyers if this clause would also apply to the SLAs (<b>ACTION</b>).</p> <p>It was highlighted that if there was a major issue, such as a flooding event, resources may be diverted to this issue which would impact upon the delivery of the SLA numbers. It was noted that exceptional events should be part of the reporting. It was agreed that this should be captured in the legal drafting (<b>ACTION</b>).</p> <p>It was suggested that an annual tolerance, such as 2% per year, could be included for exceptional events.</p> <p>It was noted that in relation to bullet point 3, there are exceptions. Data would aid in determining the likely numbers. The objective of the Working Group should be to seek one approach for both Suppliers and DNOs.</p>

	<p>the change unless it adequately balances the needs of suppliers, distributors and therefore customers. We note that in Ofgem's Strategy Consultation for the RIIO-ED1 price control (published on 28 September 2012, page 24) Ofgem expects that the SLAs should to cover network companies delivering remedial work to properties within set timeframes, in exchange for granular planning information from suppliers. So we believe that without the incorporation of a clause that ensures that planning information is provided to the correct level of detail in terms of volume and geography in the SLA arrangements the proposal would be incomplete and should be rejected by Ofgem. There are other aspects of the Strategy Consultation for the RIIO-ED1 price control that should also be taken into account by the working group. Some relevant extracts are included below.</p> <p><i>3.29 We understand that suppliers and network companies are intending to develop Service Level Agreements (SLAs). These are expected to cover network companies delivering remedial work to properties within set timeframes, in exchange for granular planning information from suppliers. While we expect these SLAs to be developed and put in place by the relevant parties, it will be important to consider carefully how any costs arising might fit within RIIO-ED1.</i></p> <p><i>3.30. To ensure related costs during the smart meter roll out are kept at an efficient level, we propose to introduce a three tier approach to the recovery of these costs: .....Tier 3: Any additional costs caused by issues that do not relate to DNOs e.g. call outs that incur higher unit costs (e.g. work conducted out of normal hours) or aborted call outs should be funded by the suppliers under their SLAs with the network companies</i></p> <p>If it is viewed by the proposer that some of the matters Northern Powergrid has highlighted may fall outside the current scope of the proposed change, we would highlight that as a working group has been set up for the change it would be a missed opportunity if its work was constrained such that it excluded matters that would produce a more fully balanced change, including the incorporation of Ofgem's proposals.</p>	<p>The Working Group agreed that reporting network issues when they are found rather than reporting in batches would be preferable. It was noted that some hand-held devices report only when taken back to the depot.</p> <p>It was noted that the proposer of DCP 153 envisages a schedule that sits within the DCUSA that sets out all of the timescales. It was queried whether more than just SLAs need to be incorporated into the schedule. It was noted that this should be considered further along the line and consideration should be given to documents outside of the DCUSA.</p>
Npower	Yes	Noted
SP Manweb Plc and SP Distribution Ltd's	SPEN are supportive of the principles of DCP 153.	Noted

SSE Energy Supply Ltd	Yes	Noted
SSEPD	Yes	Noted
UKPN	Yes, subject to points made under Q27	Noted
Western Power	yes	Noted
<p>Q2 Summary: The Working Group noted that all respondents are supportive of the principles of the CP. It was noted that the following would be valuable:</p> <ul style="list-style-type: none"> <li>• Rollout plans for Suppliers</li> <li>• Collaboration between organisations</li> <li>• Analysis of data to determine probability of a fault occurring on particular sites (e.g. for this postcode meters are more likely to be metal clad cut outs).</li> <li>• Review of flows that have been sent in the past but not actioned.</li> <li>• Reinvigorating meter readers on the importance of flagging issues during business of usual. (Feedback from meter reads suggests that they have been reporting certain issues for years with no impact. This may make them less inclined to report new issues).</li> <li>• Consideration of how exceptional circumstances will be considered under the SLAs.</li> </ul> <p>The Working Group acknowledged that funding was an issue but agreed that it could not be resolved under DCP 153. It was noted that having SLAs in place may help in determining what funds are required.</p>		
<b>Question Three</b>	<b>Do you agree with the definition for each category? Please provide supporting comments.</b>	<b>Working Group Comments</b>
AMO	The Category definitions are already documented, and do not need to change. The attached MOCOPA guidance uses a different form of words to describe the Categories. <a href="#">[Attachment Provided as Appendix A to this document]</a>	Noted
British Gas	We agree with the definitions for each category Looking at the Asset Conditions Codes the definitions appear to cover the scenarios described	Noted
EDF Energy	EDF Energy agrees with the high level categorisation for asset conditions as detailed in section 3.5 of the consultation document. However, we do have ongoing concerns about the lower level categorisation of asset conditions within those high level categories, and how those might be applied	The Working Group noted that this may be resolved by the guidance to be issued outside of DCP 153 following discussions between the ENA and meter operators. It was noted that the

	<p>by different parties. We note that there are some asset condition codes that we would regard as being in a different category to the ones defined within Appendix B.</p> <p>We believe that the proposed service levels, and indeed the whole process for reporting asset conditions and resolving any issues, is dependent on the consistent categorisation of asset conditions by Meter Operators and by Network Operators.</p> <p>In our view it is not acceptable for there to be a variance in the standards that are applied by Network Operators in terms of whether the asset condition is an emergency or not, or whether it would prevent a meter exchange or not. There must be no ambiguity as to what is or is not regarded as being safe.</p> <p>As a company with a national field force and a national customer base, we need to ensure that we have a consistent process for our operatives to follow when reporting asset condition issues, and a consistent process for the timely resolution of those issues.</p>	Working Group is not seeking to amend the categories within the scope of DCP 153 as they have been discussed extensively.
ENWL	Yes, the definition of the categories has been agreed but they were collated for another purpose and may not be a perfect fit in this instance.	Noted
EON Energy	Yes we are happy with definitions for each category. It is our understanding that these categories have been agreed by Distributors and Meter Operators and have been adopted under the MRA when sending data flows regarding the work that needs to be completed. It would not seem sensible not to change these categories at this stage.	Noted
GTC	Yes the categories appear to be consistent and appropriate.	Noted
Northern Powergrid	Yes - These matters have been extensively discussed elsewhere, and should not be revisited here.	Noted
Npower	<p><b>Category A</b> – an emergency situation that poses immediate danger. This is quite clear and understood.</p> <p><b>Category B</b> – The issue is not an emergency situation but it prevents the meter from being exchanged. This is quite clear and understood.</p> <p><b>Category C</b> – The issue is not an emergency situation and does not prevent the meter from being exchanged. This is quite clear and understood.</p>	Noted
SP Manweb Plc and SP Distribution Ltd's	We agree with the definition for each category and feel that they are representative of the types of jobs.	Noted

SSE Energy Supply Ltd	Yes	Noted
SSEPD	Agreed. The definitions for each category have already been agreed by Industry groups including the MRA, ENA and MOCOPA As per DTC CP3336	Noted
UKPN	Yes Category A replicates the definition of danger from the ESQCR Category B and C are based on the industry accepted use of these categorisations	Noted
Western Power	Yes. The definitions are the same as those used in other industry forums / documents e.g. ENA, MRA, MOCOPA etc.	Noted
Q3 Summary: The Working Group noted that no respondents disagreed with the category definitions.		
<b>Question Four</b>	<b>Do you agree that the Master Registration Agreement (MRA) Asset Condition Categories introduced by DTC CP 3336 should be replicated in the DCUSA? Please provide supporting comments.</b>	<b>Working Group Comments</b>
AMO	DCUSA may be able to remain at the level of the Cat A, B, C without needing to go into greater detail. However, the governance of the categories and codes should be only in one governance arrangement, so that any changes or amendments can be done once, and therefore always kept consistent. Amending the DTC such that the valid set is held in DCUSA is one way of achieving that.	The Working Group agreed that, as previously discussed, it was their preferred option to keep the categories in one location, namely the DCUSA.
British Gas	We agree that the Asset Condition Categories introduced by DTC CP 3336 should be replicated in the DCUSA. This will ensure visibility of the codes within the DCUSA and will make it easier for parties to understand what SLA's refer to each Asset Condition category without refer to the MRA. This does mean though that both the MRA and the DCUSA will need to be kept in alignment.	Noted
EDF Energy	EDF Energy agrees that the high level categorisation for asset conditions as detailed in section 3.5 of the consultation document should be replicated in the DCUSA as we do not see these changing over time. We do not believe that the lower level categorisation of asset conditions within the	Noted

	categories as detailed in Appendix B should be replicated within the DCUSA, as these could be subject to change based on operational experience, which would require a change to the DCUSA. The DCUSA should reference the categorisation of asset conditions in the MRA but not replicate that level of detail.	
ENWL	Consistency needs to be maintained throughout the industry documentation.	Noted
EON Energy	Yes. These categories have already been agreed and it seems sensible to replicate these under DCUSA for the purpose of agreeing SLAs	Noted
GTC	Yes, any disparity would only lead to confusion.	Noted
Northern Powergrid	As question 3	Noted
Npower	<ul style="list-style-type: none"> <li>• Yes there is a need to replicate and version control the document to ensure responses are referenced against a benchmark.</li> <li>• IF the Asset Condition Codes are to be included within DCUSA, then there needs to be a process that ensures that any change made in one, is agreed and replicated in the other.</li> <li>• The MRA and the MOCOPA guidelines specify that once issues have been rectified, the LDSO will notify Meter Operators. Therefore, there is no direct communication between the LDSO and Supplier?</li> <li>• For Category A SLA - the consultation document (section 3.11) states "<b>Category A SLA</b> – "The DNO/LDNO will attend within three hours of receiving notification of a Category A issue (by telephone or other means) on a working day and within four hours on any other day". The working group noted that it may be necessary to remove the reference to other means as this is not within the MRA definition or alternatively to amend the MRA to allow communication by other means to match Electricity Regulations".</li> </ul> <p>We agree with the working group in that either the DCUSA definition needs to remove the reference to "<u>or other means</u>" or a change to the MRA should be progressed to allow communication by other means so as to match Electricity Regulations. The drafting of the two Agreements should be aligned.</p>	<p>It was noted that version control would be addressed by removing the categories from the MRA so that they appear only in one place.</p> <p>It was noted that for bullet point two, there will be a data flow between the LDSO and the supplier.</p> <p>It was suggest that the DCUSA states that an emergency can be reported by telephone or post. The group agreed to check this (<b>ACTION</b>).</p> <p>The group discussed whether for a Category A incident a data flow needs to be issued after the telephone call. It was noted that to do so could lead to the issue being raised twice.</p> <p>It was agreed that current practice uses only the telephone and noted that the MOCOPA document states that no data flow will be sent. It was highlighted that a response flow will be sent.</p>
SP Manweb Plc and SP	SPEN agrees that the Master Registration Agreement (MRA) Asset Condition Categories introduced by DTC CP 3336 should be replicated in the DCUSA. This will	Noted

Distribution Ltd's	allow for consistence for reporting purposes and keeps the conditions the same.	
SSE Energy Supply Ltd	It is important that DCUSA reflects the categories introduced under the MRA but consideration should be given whether cross-referencing the relevant parts of the MRA/DTC Catalogue would be better to avoid any future discrepancies between the two agreements.	Noted
SSEPD	Yes if absolutely necessary but a reference to DTC CP3336 should suffice. This would avoid duplication of change should DTCCP3336 change into the future.	Noted
UKPN	If DCUSA is to hold the service level it needs to define the service. While the service can be defined by reference to the category, deeper granularity should not sit elsewhere and should reside only in DCUSA. This ensures consistency and effective change control.  If such amendments are accepted into DCUSA, the valid set of inputs in DTC data item "Asset Condition Code" should be amended such that they cross reference values specified in the DCUSA.  Therefore they should not be "replicated in the DCUSA" but should be held in DCUSA only.	Noted
Western Power	Yes.  The DCUSA-specified service levels should be linked to DCUSA-defined asset condition categories, rather than just refer to the MRA ones. This will ensure that any changes to the asset condition categories made by the MRA does not impose revised service level obligations without first having to go through the DCUSA consultation / change proposal process.	Note
Q4 Summary: The Working Group agreed by consensus that the categories should sit with the SLAs, therefore, they should be removed from the MRA and listed in DCUSA only.		
<b>Question Five</b>	<b>The proposer of DCP 153 does not believe that SLAs should be introduced for Category C as it is not urgent and does not affect the meter exchange. Do you believe it is reasonable for the DNO/LDNO to plan this work as they feel is best?</b>	<b>Working Group Comments</b>
AMO	The original intention was to only include in Cat C items that the distributor did not have to address immediately. Therefore it should not need an SLA.  See also the comment under Q12 indicating that only one code can be submitted.	Noted

	<p>We have still not totally resolved some ambiguity in the use of the codes – of particular concern is Fused Neutrals and shared arrangements. A MRA CP was raised to include (or move) these to Cat B, but this was rejected in the summer. The guidance drafted by myself has addressed these issues with the use of other Cat B codes. But there may remain some confusion. Work is on-going to resolve any remaining ambiguity.</p> <p>Distributors have reported that they believe there are small numbers of fused neutral cut-outs remaining in use. The HSE at a MOCOPA meeting discussing these issues expressed the view that once identified, the fused neutrals should be replaced quickly. At the meeting they supported the move from Cat C to Cat B.</p>	
British Gas	<p>DNOs/LDNOs should be obligated to rectify Category C faults, however as these faults do not prevent the exchange of a meter we do not believe a SLA is required. Further guidance is required for Category C faults as we have concerns that customers may be alerted to Category C faults and then will expect these to be rectified within a reasonable period of time.</p>	Noted
EDF Energy	<p>EDF Energy recognises that where an asset condition correctly meets the definition of category C (as per our response to question 3), and does not prevent the meter exchange or pose any risk to the customer or the installer, then there does not need to be an SLA in place for the resolution of such issues.</p> <p>We would be interested in understanding the indicative timescales that Network Operators are planning to have for resolution of such issues. Whilst these issues might not prevent the meter from being installed, they might be reported multiple times as a result subsequent site visits if they are not resolved on a timely basis.</p>	Noted
ENWL	<p>Agreed.</p> <p>However when an agent has visited site an obligation should be placed on the agent to report all defects irrespective of category.</p>	Noted
EON Energy	<p>Yes we feel it is best for the DNO to plan this work, although leaving the timescales open ended may be a mistake. If the customer is under the impression that there is something that needs the attention of the Distributor, they will expect to know when it will be resolved regardless if it prevents a meter exchange taking place or not.</p>	The Working Group noted that there should be an education piece for MOPs not to make customers aware of category C issues.
GTC	Yes	Noted

Northern Powergrid	Yes	Noted
Npower	Yes, these assets are likely to have been on the system for many years without adverse effect on the customer or supplier and therefore reasonable for the DNO to exchange as part of their normal planned asset program.	Noted
SP Manweb Plc and SP Distribution Ltd's	SPEN agree with the proposers view that SLAs should not be introduced for Category C as it is not urgent and does not affect the meter exchange.	Noted
SSE Energy Supply Ltd	We agree that SLAs should only be provided for Category A and B issues but would note that although no SLA is in place Distributors should make every effort to resolve Category C issues when they arise.	Noted
SSEPD	Agreed. Service level agreements should only be applied to categories A and B.	Noted
UKPN	Yes, there should not be a service level placed on the distributor for remedying Cat C jobs.	Noted
Western Power	Yes. Category C defects do not affect any party to the DCUSA other than the DNO and consequently it is reasonable for the DNO to self-determine how to best manage those assets.	Noted
Q5 Summary: The Working Group noted that all respondents agree that SLAs should not be introduced for Category C		
<b>Question Six</b>	<b><i>Distributors: What are your self imposed turnaround times for resolving network issues at the moment?</i></b>	<b>Working Group Comments</b>
AMO	N/A	
British Gas	N/A	
EDF Energy	Not applicable	Noted
ENWL	Category A – initial attendance is currently within 3 to 4 hours to assess situation & take appropriate response. All other response times depend on the nature of the work required and any other events or incidents e.g. adverse weather conditions or major faults which would have to be prioritised first. With increased meter changes by relatively in experienced staff in many instances	Noted

	DNOs will experience higher volumes of call outs that are meter related issues this could adversely affect self imposed turn rounds of times for resolving issues.	
EON Energy	n/a	
GTC	Typically we will give the customer advance notice and complete the work at the customers' convenience – as a minimum this will be at least five days.	Noted
Northern Powergrid	<p>Safety issues: 1 hour</p> <p>Emergency – Example; Fire at the service point. An “Emergency” job would be raised by the call taker. We would allocate to a rapid response operative and attendance is aimed at 1 hour. Expectation would be for the MOP to remain on site.</p> <p>Distributor’s fuse: 3 hours</p> <p>Off supply – Example; The customer has gone off supply due to faulty metering equipment and the MOP attends to change the meter. The MOP cannot remove the fuse to isolate and contacts the DNO. The call taker would raise a job with a 4 hour response target. In the majority of instances the MOP would remain on site, or make arrangements with the customer to return later in the day post-completion of our works.</p> <p>Non-urgent cut-out change: Timescale = 13 weeks</p> <p>Programmable works – Example; The MOP has a job to replace a meter. Although there is nothing inherently unsafe the cut-out requires replacement, usually due to a combination of condition and age. The MOP would report the defect to initiate a cut out change and our call taker would arrange for a ‘Cut-Out Change’ job to be raised. This is programmable works and would be allocated to a contractor. Although the general turnaround is approx. 6-8 weeks, 13 weeks is the timescale that we normally work to in order to allow ample notice to be given to the customer and enables our contractor to carry out works in a geographical area.</p>	Noted
Npower	DNO Response	
SP Manweb Plc and SP Distribution Ltd’s	Currently SPEN have no self imposed timescales on resolving category B and C incidents Many are placed into organised programmes of work, others may be batched up and sent to external Contracted Organisations and some are dealt with internally. All network issues are logged when identified and the work will be	Noted

	completed but not against set timescale for resolution.	
SSE Energy Supply Ltd	Not applicable	Noted
SSEPD	Our internal process is to contact the customer within 5 working days of a query with a target for resolution of 30 working days subject to force majeure incidents and other matters beyond our reasonable control e.g. works in the road and third party land issues.	Noted
UKPN	N/A	
Western Power	<p>“Network Issues” is assumed to mean service cable / cut-out related defects, commensurate with Category A and B incidents, which are reported to WPD by Suppliers (Meter Operators) and/or Customers.</p> <p>The response depends upon whether the issue is an emergency situation and the nature of the defect. For example, WPD would try (i.e. an aim not an obligation) to complete a straightforward, non-emergency related, cut-out change within a three week period. More complicated defects and those whose resolution requires an opening to be made in the highway, for example, would take longer to complete. In an emergency situation (i.e. where there was immediate danger) WPD would try and complete the work as soon as possible (i.e. within hours).</p>	
Q6 Summary: The Working Group noted that some respondents had self imposed targets, which would aid the Working Group in setting SLAs. It was noted that these targets are based current volumes.		
<b>Question Seven</b>	<b><i>Distributors: Does this differ in an emergency situation?</i></b>	<b>Working Group Comments</b>
AMO	N/A	
British Gas	N/A	
EDF Energy	Not applicable	
ENWL	<p>Category A is an emergency situation.</p> <p>Where there is an incident involving widespread loss of supply or a weather related events then yes.</p>	Noted
EON Energy	n/a	
GTC	3 hours business day, 4 hours non business day	Noted

Northern Powergrid	<p>Yes - In network emergencies:</p> <ul style="list-style-type: none"> <li>All potential safety issues are dealt with as the highest priority. However, the number of such issues raised simultaneously (e.g. wires down) puts pressure on our ability to meet our 1-hour target, including during major incidents/weather events;</li> <li>the normal response target times and related 18-hour restoration standards of performance may be suspended;</li> </ul> <p>routine work is cancelled in the affected emergency zone and all efforts are focussed on addressing immediate safety issues and the restoration of customer supplies</p>	Noted
Npower	DNO Response	Noted
SP Manweb Plc and SP Distribution Ltd's	In an emergency situation (Category A) - where the customer is off supply, SPEN adhere to the timescales prescribed by the Guaranteed Standards. Where the customer is not off supply but there is an emergency situation identified, SPEN will attend to that customer as soon as is reasonably possible. In an emergency situation, customers may be advised to switch off electricity supply where it is safe to do so, however, this does not mean that the customer is under the timescales in GS. Emergency calls will be prioritised above all other planned work due to the safety risks involved.	Noted
SSE Energy Supply Ltd	Not applicable	Noted
SSEPD	A working day – 3 hours to attend and make safe Non working day – 4 hours to attend and make safe.	Noted
UKPN	N/a	Noted
Western Power	Yes (See Q6 above).	Noted
Q7 Summary: The Working Group noted the responses.		
<b>Question Eight</b>	<b><i>Distributors: How do you expect these to change under the smart metering roll out?</i></b>	<b>Working Group Comments</b>
AMO	N/A	
British Gas	N/A	

EDF Energy	Not applicable	
ENWL	We have not seen any evidence to suggest that the percentage of these incidents would increase compared to current meter change programmes, the potential issue is that more meter changes are taking place but it is difficult to say as the volumes are still unclear. Please refer to previous comments in question 2. re volumes timings/dates and post code role out.	The working group noted that it is currently difficult for DNOs to determine the volumes that Suppliers are doing.
EON Energy	N/A	
GTC	We do not believe that these will change	Noted
Northern Powergrid	In principle, our existing target standards could remain the same although the additional volumes during the roll-out period will have cost implications for DNOs. However, this would also be subject to appropriately detailed, accurate and up to date volume forecasts being provided by suppliers	Noted
Npower	DNO Response	
SP Manweb Plc and SP Distribution Ltd's	We would anticipate that the emergency situation turnaround times will remain the same as they currently are set as we see no real evidence that supports reason to change.	Noted
SSE Energy Supply Ltd	Not applicable	
SSEPD	We would hope to not see any change but realistically we have to take into account the increased volumes.  A caveat to this statement is that Suppliers smart metering roll out plans are transparent and circulated far enough in advance to ensure DNO's can resource accordingly. This would need to include geographical locations, timings and volumes at the very minimum.	Noted
UKPN	N/A	
Western Power	This is directly related to the rate at which incident notifications are received and the resources available to deal with them.  Electricity distribution is a regulated industry whose funding is determined by the Regulator for a particular price control period. The submission for last price control review (DPCR5) did not include any requirement associated with the rollout of smart metering. The next price control review (RIIO-ED1) has yet to be agreed.	The working group noted that for tower blocks it would be useful for there to be an industry strategy for all Suppliers to target them at the same time.

	<p>It requires many months to recruit, train and develop any new member of staff up to the requisite competence levels.</p> <p>There is a great deal of uncertainty about the rate at which incident notifications will be received:</p> <ul style="list-style-type: none"> <li>• The analysis to date about the proportion of meter changes which will reveal a network defect is quite rough and ready. Any underestimation will result in a miscalculation of DNO resource levels</li> <li>• Supplier rollout plans upon which DNOs can estimate their resource levels are only indicative. Any slippage in the programme will result in the work being back-end loaded, leading to an underestimation of the DNO resource levels</li> <li>• It is unclear how Suppliers will roll out the meter changes. Will the changes be spread out fairly evenly across the distribution network area throughout the programme, or will a narrow geographic area be targeted at any one time. The latter approach would lead to an underestimation of the DNO resource levels in the targeted area</li> <li>• Will the Suppliers leave the more difficult meter changes to later on in the programme, resulting in the network defect rates being back end loaded. Again, this approach would lead to an underestimation of the DNO resource levels later on in the programme</li> </ul> <p>Whilst WPD would aspire to keep the turnaround time for resolving network issues unchanged, the fact that there is no agreed funding, no recruitment / training of additional staff taking place, and so much unpredictability about the rate at which defects will be received means that this is unlikely to be achieved in practice.</p>	
<p>Q8 Summary: The Working Group noted the points raised regarding uncertainty were discussed earlier in this document.</p>		
<p><b>Question Nine</b></p>	<p><b>Do you agree with the proposed SLAs and are the timescales reasonable and do you believe category A incidents should only be reported by telephone?</b></p>	<p><b>Working Group Comments</b></p>
<p>AMO</p>	<p>Method of report - Discussion to date has been that Cat A issues are urgent issues that need immediate resolution. Phone is the only mechanism to ensure the issue is progressed immediately. Cat B &amp; C are less time critical which is why DTN flows are appropriate.</p>	<p>It was noted that there will be significant focus in the guidance regarding taking appropriate actions.</p>

	<p>Timescales – Cat A issues. The Meter Operative at site will seek to make safe any immediate danger. However, there are a wide range of scenarios and ranging from being able to make safe, public safety is maintained, such that the Meter Operative can leave site to continue with the next scheduled work. The Distribution Business can attend resolve the issues, and the Meter Operative can be scheduled to return at a later date. On this basis the length of response time is driven by the customer service implications of the customer being off supply, PLUS the repair time. This is similar, but <i>not the same as</i> a failed cut-out fuse. As the time to restoring the supply to the customer will be increased by the repair time.</p> <p>Other scenarios are where the Meter Operative must remain at site to protect the public from danger. In these cases the Meter Operative will be delayed from continuing to further scheduled work until the Distribution Business operative attends site.</p> <p>The Slindicates hours as</p> <ul style="list-style-type: none"> <li>• 7.00 am and 7.00 pm on each working day and 9.00 am and 5.00 pm on any other day</li> <li>• three hours on a working day</li> <li>• four hours on any other day</li> </ul> <p>It is an issue for suppliers and distributors to resolve the appropriate length of time (hence a DCUSA CP) but a prompt response in [90]% of cases would be good for customer service in minimising the customer interruption time, and the aborted work that the meter operative may not be able to attend. Current assumption is four dual fuel changes per day.</p> <p>Should also note that linking the SLA to the GS will result in any issues identified after 7pm or 5pm on non working days not being visited until the following day. This may not be compatible with metering work performed in an evening.</p> <p>The gas industry equivalent is 1 and 2 hours.</p>	
British Gas	<p>We are concerned that the proposed timescales are too wide and that a better approach would be to agree a service level linked to the reason for the exchange. For example where a meter change is required to meet the needs of vulnerable customers i.e. credit to prepayment or the service needs to move because a prepayment meter cannot be accessed these should be subject to a must quicker</p>	<p>It was queried whether this was an SLA or a bilateral agreement. It was noted that this may be a separate issue.</p> <p>It was noted that it should be feasible to complete the majority of jobs sooner rather than later. It was</p>

	<p>SLA. As a proportion of all jobs these will be small but there should be a mechanism whereby these types of jobs can be subject to a faster SLA.</p> <p>We would also like to see the SLA split for instance 80% of jobs should be completed within 4 weeks with 100% completed within 8 weeks. Under the current proposal all jobs could in theory take 8 weeks to complete but the SLA would still be met.</p> <p>We agree that category A incidents should only be reported by telephone. Ideally we would like to see a standard for call answering if not already in place with each distributor.</p> <p>In some instances it will also be appropriate for category B faults to be reported by telephone. This will be particularly the case in situations where the DNO finds it useful to be provided with a description of the fault whilst the meter operator is still on site.</p>	<p>highlighted that the more information that is provided the better it will be to plan work. It was noted that the free text box in the data flow could be used to provide additional information.</p> <p>It was noted that it may be feasible to set up local phone numbers for discussing category B incidents.</p>
<p>EDF Energy</p>	<p>EDF Energy agrees with the SLAs proposed within the consultation document.</p> <p>In regard to category A incidents, we agree that these should only be reported by telephone. This is reflective of the severity of the issue as these incidents pose an immediate and significant risk. Only through direct telephone communication will the person reporting the issue be able to have certainty that the report has been received and understood. In order to achieve this a fully maintained list of key contact numbers must be provided by each Network Operator.</p> <p>Given the criticality of this communication we would like to understand how Network Operators propose to provide resourcing to meet this requirement, and what targets they would look to have in place for answering these telephone calls. Again, we believe that these standards must be consistent across all Network Operators.</p> <p>Also in regard to Category A, we would regard the timescales defined in section 3.11 of the consultation document as being an absolute maximum, and that response times by Network Operators must be reflective of the nature of the incident.</p> <p>If the operative reporting the issue is not able to barrier off the faulty equipment and make the premises safe then this should be recognised as part of the conversation with the Network Operator and these jobs must be prioritised for a more urgent response, which must be well within the maximum times stated given the severity of the incident and potential impacts in terms of customer and operative safety.</p>	<p>Noted</p>

	<p>Where the operative is able to make the premises safe they would then potentially be able to carry out other tasks while waiting for the Network Operator to confirm the issue has been resolved, minimising the amount of unproductive time.</p> <p>In regard to Category B incidents, EDF Energy believes that 40 working days is the absolute maximum time that should be required to resolve an issue in this category; we favour Option 1 as defined in section 3.12 of the consultation document.</p> <p>In the case of both Category A and Category B incidents a unique reference number must be provided however the incident is reported so we can track progress or handle any subsequent issues raised by the customer with us, even after the job has been completed.</p>	
ENWL	<p>As long as Category A is real emergencies then reporting by phone initially, then a dataflow confirming the issue.</p> <p>However an assessment will be made when we visit site and depending on the nature of the issue i.e. genuinely urgent or next day we will then remedy accordingly.</p> <p>Service levels cannot be determined prior to volumes and time scales being known.</p> <p>In order to undertake proper analysis of the proposal detailed analysis of role out plans is required and these should be obtained from suppliers.</p>	Noted
EON Energy	<p>No. We believe the timescales are too short for the Distributor to carry out the remedial work. We believe that category B visits should be completed within 25 working days of the D0135 flow. We believe this fits in with the precedent set by the MRA working practice 151 for large scale disconnections. This working practice was based on the Distributor view that it was unreasonable for a customer who had asked for disconnection to wait longer than this for a Supplier to arrange the removal of meters and obtain final readings from a site. Baring in mind that a large scale disconnection can involve hundreds of meters, Suppliers have had to make provision via their Meter Operators to be able to react to these requests. We believe this is a similar situation and that customers should not have to wait beyond the same timescales in order to be able to gain the benefits of a Smart meter. We suggest the working group look at the delayed benefits to customers and the industry should meter changes be delayed.</p> <p>We are comfortable that category A incidents are reported by telephone as these are all emergency situations to report by data flow would delay resolution.</p>	It was noted that the response should say “we believe that the timescales are too long”.

GTC	<p>The proposed SLA's &amp; timescales are reasonable.</p> <p>We feel that the procedure for category A incidents however is not clear. Category A incidents, quite rightly, should only be reported by telephone since these are emergencies however it is quite clear that a set of codes has been created in order for a D0135 to be sent. Does this mean that a call will take place and a follow up data flow sent or is the data flow superfluous? If the data flow is not necessary for a category A incident then it seems to us that this could be open to accidental misuse. Perhaps it would be beneficial to have a reporting mechanism for how many of these incidents occur to ensure that safety is not compromised and that all parties are made aware of the importance of telephoning these through?</p> <p>For reporting purposes it would be beneficial for the distribution business to receive a D0135 flow however safety has to be the paramount concern and if the receipt of a D0135 flow for a category A incident without the associated phone call could cause in any way a major safety incident then this loophole must be removed.</p> <p>Our main concern is the potential for a Category A incident to occur out of hours but only a D0135 flow to be sent to report it. It is unlikely that an out of hour's service will have immediate access to the data flow which means that this could have a major impact on safety and the SLA.</p> <p>If the intention really is to telephone these through with a follow up data flow then as a minimum we would expect each supplier to quote the unique reference we would provide to them when they called the emergency through on the follow up D0135 flow.</p>	The Working Group noted that they had agreed that category A should be reported by telephone only.
Northern Powergrid	<p>Yes, we agree that a 3-hour attend on site standard for category A incidents is reasonable.</p> <p>Yes, we agree that a 40-day timescale for resolving category B issues where consents are not required is reasonable.</p> <p>Yes, we believe that category A incidents should initially be reported by telephone, but we would also require a confirmation data flow to ensure that category A incidents can be monitored and measured.</p>	Noted
Npower	Yes, the time scales by category offer the supplier and customer reasonable expectations as a maximum time frame.	Noted
SP Manweb Plc	SPEN agree with the proposed SLA's and agree that Category A incidents should only	Noted

and SP Distribution Ltd's	be reported by telephone. Immediate safety hazards must be dealt with as soon as possible and any delay in notifying the DNO may lead to an increased safety risk for the customer.	
SSE Energy Supply Ltd	We agree with the proposed SLA for Category A issues and believe reporting by telephone is the best route given the safety implications attached to this category. The proposed timescales for Category B seem reasonable but we would be keen to see issues resolve as quickly possible to support Smart rollout.	Noted
SSEPD	The proposal for Category A incidents - agreed. This should reflect reg 12 of the Electricity (Standards of performance) regulations. The working day needs to be defined as 7am to 7pm Monday to Friday and 9am -5pm on non working days. Category A faults should be reported by telephone as per DTC CP 3336 For category B defects option 2 is the more viable with some amendments. A proposal is the DNO/LDNO will complete 80% of the jobs within 60 working days. Subject to the reasons outlined in question 6	It was noted that if less than 100% were to be completed within a set timescale then there should be clarity over when the others should be completed by.
UKPN	We agree with the service levels in principle. However all service levels should be phrased in terms of a percentage that should be met rather than an absolute level (e.g. x days y% of the time). Category A should be reported by phone.	Noted
Western Power	<b>Do you agree with the proposed SLAs</b> Yes, in principle (see comments below). <b>Are the timescales reasonable?</b> "Working Day" is assumed to be the DCUSA defined term (i.e. as per section 64 of the Electricity Act 1989). WPD has no influence over the working hours of the other parties and feels that it is unreasonable for the response time to be fixed for the whole 24 hour period. Suggest modifying the wording along the following lines: <i>"The DNO / LDNO will attend a Category A issue within:</i> <ul style="list-style-type: none"> <li>• <i>Three hours on a working day if notification is received between 8am and 6pm</i></li> <li>• <i>Four hours on any other day if notification is received between 9am</i></li> </ul>	Noted

	<p style="text-align: center;"><i>and 5pm</i></p> <ul style="list-style-type: none"> <li>• <i>Six hours for notifications received outside these times</i></li> </ul> <p><b>Should category A incidents only be reported by telephone?</b></p> <p>Yes.</p> <p>Any incident (irrespective of category) should only be reported once in order to avoid potential confusion / duplication of response.</p>	
<p><b>Q9 Summary:</b> The Working Group noted that whilst some amendments were suggested, the majority of respondents agreed with the proposed SLAs.</p>		
Question 10	Is the proposal that category B visits should be scheduled within 10 days reasonable?	Working Group Comments
<p>AMO</p>	<p>Cat B – The key driver here is the ability to tell a customer that the Distribution Business will need to attend, and they will be in contact/attend with x days. The customer will seek some certainty, and will probably be frustrated as the work expected to completed has not been completed – possibly leading to a series of repeat visits:</p> <ul style="list-style-type: none"> <li>• Distributor to ‘asses work’</li> <li>• Distributor to do work</li> <li>• Revisit by Meter Operative to complete metering work.</li> </ul> <p>Each of which may require days off work, etc. It is therefore important that the process is as ‘slick’ as possible. The original discussions envisaged that a high proportion of work would be assessed and completed in the single visit by a jointer/linesman.</p>	<p>The working group noted that it may be an assumption that a high proportion of work will be completed in a single visit.</p> <p>The working group discussed whether using the term ‘a customer agreed appointment’ would be better phrasing. It was highlighted that with this phrasing it would not be possible to meet the SLA if contact could not be made with the customer. It was noted that by leaving the term ‘scheduled’ DNOs would be able to write to a customer with a proposed visit date, the customer could then get in contact if they cannot do the proposed date. It was agreed to use ‘schedule an appointment’.</p> <p>It was noted that it is key for all relevant customer information to be provided to the DNOs. An action was taken to confirm if there is a requirement for the Supplier to provide the DNO with the customer’s contact details (<b>ACTION</b>).</p> <p>It was suggested that many customers prefer that contact is made via email. It was noted that many industry flows do not facilitate this. It was</p>

		highlighted that text is also a good medium.
British Gas	We believe that category B visits should be scheduled within 10 days. If suppliers are provided with a scheduled date we may be able to schedule our meter operator to attend on the same day and thereby reduce the inconvenience on the customer.	Noted
EDF Energy	EDF Energy believes that the scheduling of a visit within 10 working days is not only reasonable, it is absolutely essential in terms of managing customer expectations. The asset condition report would usually result from an attempt to install a new meter; the customer is therefore aware that the meter has not been installed for a reason related to the electricity equipment associated with their premises.  They would therefore be concerned about how this might be resolved; we believe that is imperative that our operatives are able to set a clear expectation with the customer as to when they will be contacted in regard to the resolution of the issue. Anything else creates too much uncertainty and will detrimentally affect our ability to manage our customers.	Noted
ENWL	Detailed projections of volumes and roll-out strategies are required before we can provide a response to this question. In principle, 10 days does appear reasonable but this must be caveated by suppliers collectively keeping volumes within pre-determined limits. If these are exceeded we would expect that the service levels would not apply.	The group noted that keeping within pre-determined limits would be difficult. For instance, what if a 5% fault rate was expected but 20% is found.  It was suggested that there are going to be roll out monitoring requirements put in place by DECC so the SLAs could potentially be linked to these.  It was noted that forecasts of the number of issued expected have shown significant variance so far, therefore, expectations going forward are likely to continue to vary.
EON Energy	Yes this is reasonable, as it gives Suppliers the opportunity to schedule the re-visit by the MOP at the same time, or as close to the Distributor visit as possible, to enable the best possible customer experience and not to delay the benefits to the customer from smart metering. Customers will have been disappointed that their meter will not have been fitted at the first visit and will therefore expect a new appointment to be scheduled promptly	Noted

GTC	Yes	Noted
Northern Powergrid	yes	Noted
Npower	Yes, the time scales are reasonable given that a D0135 flow is sent to the DNO. We would like the DNO to confirm to the Supplier and Meter Operator via DTC flow the proposed visit date once they have arranged/scheduled this with the customer. This will help with the follow up meter exchange activity for sites currently facing a category B visit (see Q16).	Noted
SP Manweb Plc and SP Distribution Ltd's	The proposal that Category B visits should be scheduled within 10 days of receiving a dataflow is reasonable.	Noted
SSE Energy Supply Ltd	We feel 10 days is more than adequate to schedule a visit with a customer in normal circumstances. However, we believe that this should not form part of the SLA and that Option 2 is preferable for Category B issues.	Noted
SSEPD	This proposal is reasonable but this should be best endeavour by the DNO. Customer holidays etc. As option 2 is our preferred option no SLA is necessary.	Noted
UKPN	No. It is up to the distributor to arrange scheduling to meet any service level imposed on him.	Noted
Western Power	WPD does not believe that this proposal is reasonable. 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. The DNO would not know how complicated / time consuming the defect is to resolve until it has examined the defective equipment. For this reason most DNOs would want to visit the Customer well within the permissible turnaround time as a matter of course. An unintended consequence may be to worsen the customer experience as a result of a DNO carrying out token visits just to meet a service level requirement.	Noted
Q10 Summary: It was noted that the majority of respondents believe that scheduling within 10 working days is reasonable.		
<b>Question 11</b>	<b>Distributors: What will be the impact of these SLAs on resources? Would you ramp up internal resources or set up contracts with external organisation?</b>	<b>Working Group Comments</b>

AMO	N/A	
British Gas	N/A	
EDF Energy	Not applicable	
ENWL	<p>We cannot determine this without greater information from suppliers.</p> <p>It may be appropriate for MOPs to have their own trained and authorised staff to offer one-stop service for some categories of work.</p> <p>Whether we choose to use internal resource or contractors is irrelevant to this consultation.</p>	Noted
EON Energy	N/A	
GTC	We do not expect there to be a major increase in reports of issues and therefore at this time will not be increasing resource.	Noted
Northern Powergrid	Adequate volume forecasts from suppliers will be key to appropriate resource planning, the funding of the additional work will also need to be addressed. Work carried out at industry level suggests that network defects may be presented from around 4% of smart meter installations. The decisions to resource internally or via external contracts will largely be driven by timely and appropriately granular geographic forecasts from suppliers. It should be noted that current volumes of smart installations appear to fall short of the consolidated forecast produced by DECC from individual supplier forecasts, which implies that volumes towards the end of roll-out will be higher than currently forecast. Significant changes from agreed forecasts would create an unacceptable degree of uncertainty and would impact our ability to comply with the SLA.	Noted
Npower	DNO Response	
SP Manweb Plc and SP Distribution Ltd's	<p>We feel that there will be a significant impact upon resources as a result of the SLA's.</p> <p>The main issue facing SPEN is the uncertainty of volumes of meter installations as suppliers have been slow to release their roll out programmes. In the absence of the volumes, it is difficult to anticipate the expected impact and also leaves DNO's in a situation where they may not be able to adequately resource.</p> <p>This is an issue for SPEN as we urgently need the volumes to identify if we will have a resourcing issue and therefore raise a business case for additional support or to set up a contract with external organisations. However, setting up contracts with</p>	Noted

	external organisations will take approximately 6-9 months, therefore we require volumes as soon as possible to have any chance of meeting the SLA's if they are imposed	
SSE Energy Supply Ltd	Not applicable	
SSEPD	Actions would be carried out as necessary to ensure resource is available however the issue of how network operators receive adequate funding does need to be resolved for both the current and next price control periods.	Noted
UKPN	<p>We expect a step change in volumes of this type of work associated with the smart meter roll out. Apart from the volume impact increasing resources, service levels may cause a need to increase resources over and above any volume impact if the service levels require work to be completed earlier than would otherwise have been the case.</p> <p>If resources are an issue, it might be that a system of localised volume constraint provisions could be introduced. Under the old JPW MOP agreement, if a supplier requested volumes of work which either individually or taken together with work for all other suppliers, exceeded a volume that could reasonably be achieved, the MOP could issue a notice to that effect and, subject to a right of appeal to Ofgem, the MOP would be able to prioritise work on defined grounds. This would release him from the standard service level requirements. A similar concept could be introduced here in some way.</p> <p>Alternatively, and probably better, the connections guaranteed standards regulation 11 waives an obligation if monthly average volumes exceed 115% of the prior year's monthly average. An approach like this may alleviate concerns around volume growth.</p>	<p>The Working Group noted that this is a sensible idea.</p> <p>The group agree in principle that there would be benefit in linking the SLAs to projected roll out targets. However, it was noted that information on this is not currently available in the level of detail required. An action was taken to seek details from DECC on what the plans are for roll out reporting and targets (<b>ACTION: KW</b>)</p>
Western Power	WPDs preference is to ramp up internal resources to deal with these incidents. This does not, however, preclude the use of external service providers should this be deemed to be necessary.	Noted
Q11 Summary: The Working Group agreed that it would be very difficult to answer this question with any great intelligence due to the current unknowns. It was agreed in principle that there may be benefits in linking the SLAs to projected roll out targets.		
<b>Question 12</b>	<b>For category B incidents, do you think that there could be different service levels</b>	<b>Working Group Comments</b>

	for different types of incident?	
AMO	<p>No</p> <p>The design principle adopted in developing the use of the flow was that <i>only one code</i> can be reported. The Distributors advised that when they attend site they will resolve <i>all</i> the issues present at the site at that one visit. It is therefore important that the correct <i>Category of fault</i> is identified to it is attended to in an appropriate timescale, but the detail within each code would not be an appropriate level to base an SLA.</p> <p>Adopting a different SLA may also lead to an unintended consequence of increased reporting under a code which has a shorter response timescale. Which would be extremely difficult to monitor.</p>	Noted
British Gas	<p>As per our response to question 9 we believe that there should be different service levels depending on the reason for the meter exchange. If the exchange is required for vulnerable customer to meet social obligation requirements then these should be subject to a faster timescale. We would suggest that for these small number of cases that a 5 working day SLA would be appropriate.</p>	Captured earlier
EDF Energy	<p>EDF Energy does not believe that there can be different service levels applied for category B incidents. By definition (as per question 3) a category B incident is preventing the meter from being installed; given that this is the case, the issue must be resolved within the defined timescales in order to minimise the impact on the customer. It is also vital for Suppliers to have a clear and consistent view of the timeframes for resolution of these issues in order to be able to manage their customers' expectations.</p> <p>We believe that we need to keep the categorisation of asset conditions as simple as possible, and ensure that the processes do not allow attempts to reclassify (or wrongly classify) problems in order to get a faster response, or be able to undertake the work in a longer time frame.</p>	Noted
ENWL	<p>Not really.</p> <p>A suggested matrix would be required before we could comment constructively.</p>	Noted
EON Energy	<p>We would prefer one service level for all incidents. We have an obligation to keep the customer informed as to the progress of a job, having different levels will make it very difficult to leave the customer with a clear indication of when their</p>	Noted

	installation will be completed.	
GTC	We do not believe so and the service levels proposed are reasonable.	Noted
Northern Powergrid	The issue is less over types of incident than the work required to resolve, and specifically over the need for consents from third parties (including highways authorities) for access and breaking up public highways and footpaths where required. We suggest caveats for the SLAs including where third party consents are required.	Noted
Npower	We would not want to extend the SLA as this would be a degradation of the proposal, but if certain network asset changes offer the DNO no real problems and can be resourced in a short timescale, it may be reasonable to offer the customer a shorter time scale. We would not anticipate many jobs to be scheduled less than a 15 day window, if response times are likely to become more common place this may impact the scheduling and resource planning for the MOP to follow up the DNO visit on the same day and complete the Smart meter installation/exchange.  It is accepted that there may be exceptional circumstances rising or lateral mains, where the standard SLA may not always be appropriate and these should be dealt with separately.	Noted
SP Manweb Plc and SP Distribution Ltd's	We agree that there could be different service levels for different types of incident, however this may lead to confusion and therefore it may be better to standardise the SLA as 40 working days.	Noted
SSE Energy Supply Ltd	Category B issues prevent the installation of a Meter and should all be dealt with on under the same service level to allow the installation to continue.  Consideration should be given to adjusting Service levels where the Customer is vulnerable or on the Priority Services Register.	Noted
SSEPD	The preferred option is one service level agreement to ensure there is no confusion. A 'stop the clock' facility may be prudent where issues require additional works or the customer requires an alternative appointment date.	Noted
UKPN	No – this is a level of detail too far	Noted
Western Power	WPD is not sure what benefit would be gained from this approach. In all cases the meter exchange cannot take place until the incident is resolved and there does not appear, in the grand scheme of things, to be any advantage gained from one type of Category B incident being resolved a few days earlier than another. There would,	The Working Group noted that it would be difficult to decide on differing service levels. For example, you could not say for category B5 incidents you always need to dig up the road so it should have a

	<p>however, be a negative impact on the complexity of the system changes needed to manage and report on an approach like this.</p> <p>To date there has been limited evaluation of the incidents that are likely to arise during the roll-out of smart meters. There are estimates for the proportion of meter exchanges where a defect is likely to be encountered and an estimation of how many of these are likely to be Category A, B and C. There has been no attempt to estimate the quantities of each subcategory of defects. Accordingly it is not possible to estimate the resource levels needed to realise an approach along these lines.</p> <p>The service level specifies a maximum turnaround time for each defect, not a minimum. It is likely that a sizeable number of incidents will be cleared in a shorter timescale than the maximum permissible.</p>	<p>longer SLA.</p> <p>It was noted that from a Supplier perspective they would want to know about when the work would be done, any reconnaissance visit is not important to suppliers.</p> <p>It was suggested that telling Suppliers when a visit is to occur is more about process than service level. As such it may be outside of the scope of the SLAs.</p>
<p>Q12 Summary: The Working Group concluded that the majority of respondents do not want a split service level.</p>		
<p><b>Question 13</b></p>	<p><b>Do you think it is reasonable for Meter Operators to provide a photo of all category B incidents?</b></p>	<p><b>Working Group Comments</b></p>
<p>AMO</p>	<p>No</p> <p>Not all staff have cameras. The DTC does not have a capability to transmit photographs. The administration to make photographs available in other ways could be excessive, compared with the benefit.</p> <p>Some staff do have cameras and may be able to provide a photograph, in some cases. It would be inappropriate to mandate the use of a camera at this stage, but if stakeholders found this beneficial and technology develops then it may be worth exploring further in the future.</p>	<p>It was noted that it is not the ability to take the photo that is the really difficulty, but rather storing the large number of photos that would be generated.</p> <p>It was noted that if DNOs have a photo there is more likely to be a successful outcome for the customer. It was highlighted that systems would need to be developed to facilitate this. For instance, the photo cannot be provided with the data flow and systems would be needed to store the photos.</p> <p>The Working Group agreed that they could see the benefits of providing photos; however, the practicalities need to be considered. It was noted that this was a process question.</p> <p>The group agreed that this was worth further exploration as it may pay for itself.</p>

British Gas	Although the theory of this sounds sensible we do not believe that in practice this would work. Currently our meter operators are not equipped with cameras. We have no mechanism for forwarded any photos to the DNO other than e-mail and these would need to be matched up with the D0135.	Noted
EDF Energy	<p>EDF Energy does not believe that it is reasonable for Meter Operators to provide photos of all category B incidents. Such a requirement would not only potentially delay the communication of incidents on a timely basis but will impose a significant cost burden on Meter Operators (and therefore Suppliers), not only in terms of the equipment required to take photographs, but the processes for managing and communicating those. In the absence of a proven business case for this investment, we believe that this would be unreasonable.</p> <p>In order to be able to mitigate the impact of inconsistent identification of asset condition issues, and specifically those within category B, we recommend that there is a very clear guidance issued to Meter Operators, not only on the accurate identification and categorisation of asset condition issues, but also the additional information required (including formatting of that information) to be sent on the D0135. This will then allow Network Operators to make an accurate assessment of the issue and prioritise and action this appropriately. Again, we believe that this must be consistent across all Network Operators; we can see no reason for any variation in this regard.</p>	Noted
ENWL	Yes & ideally for Category A & C as well.	Noted
EON Energy	No. We cannot see what benefits anyone will get from photographs. It will also be extremely difficult to manage. Whilst a good idea the problems will be managing and maintaining volumes of these & ensuring they all get cross referenced with the right properties etc. Maybe acceptable on an exceptional basis or where the MOP is unsure of the categorisation.	Noted. The group noted that there may be greater benefit for incidents that are unusual.
GTC	Yes however we note the concerns of the working group regarding the potential for large file sizes. It may be prudent for the Meter Operator to make the photo available upon request rather than sent outright with the data flow.	Noted
Northern Powergrid	yes	Noted

Npower	We can see that there may be a need under defined conditions, but much of the work is straight forward, there will be a file handling issue with transmitting the data and aligning this to the D135 and MPAN, it is therefore not reasonable to be a defined requirement within the SLA.	Noted
SP Manweb Plc and SP Distribution Ltd's	<p>Whilst we think it is reasonable for Meter Operators to provide a photo of all category B incidents, it is questionable how this information could be captured and sent back to the DNO's and also the memory capacity required to store a large volume of pictures.</p> <p>However, we do feel that as a DNO we would benefit greatly from receiving a picture of the service position as it could help us identify the correct type of resource required, thus reducing the impact for the customer and improving the level of service we provide.</p>	Noted
SSE Energy Supply Ltd	<p>Whilst we recognise the benefits of having a photo for category B incidents, we are concerned about the cost of providing appropriate equipment to field staff; the data storage requirements to hold any photos; the method of transferring photos between Meter Operator and Distributor (There is no mechanism to attach photos to the D135 flow).</p> <p>Rather than mandate provision of photos, guidance could recommend or highlight the benefits of providing photos.</p>	Noted
SSEPD	No. There is no facility in a DO135 flow to attach a photograph.	Noted
UKPN	<p>Yes.</p> <p>UK Power Networks provides two generic email addresses, <a href="mailto:UrgentFaultReport@ukpowernetworks.co.uk">UrgentFaultReport@ukpowernetworks.co.uk</a> for category A type reports and <a href="mailto:Non-urgentFaultReport@ukpowernetworks.co.uk">Non-urgentFaultReport@ukpowernetworks.co.uk</a> for category B and C reports.</p> <p>It does not seem unreasonable for photographic evidence to be captured and passed to the distributor. Visual information may speed repair works through identification of the equipment on site and the spatial arrangements of the equipment.</p>	Noted
Western Power	<p>WPD does not believe that this proposal is reasonable.</p> <p>Category B defects are reported by data flow and there is no mechanism for attaching photographs to the flow.</p> <p>Sending the flow and photograph separately would create an administrative burden</p>	It was the view of the working group the further work is needed to determine whether this something that should be progressed. It was suggested that as we go further down the line of

	<p>from (i) having to manually reconcile a photograph with a data flow and (ii) having to get the photograph to the distribution responder who is dealing with the incident.</p> <p>There is also the IT system burden associated with storing the photographs (assuming they would be sent in electronic rather than paper format).</p>	<p>the smart metering roll out the benefits of having a photo may become greater.</p> <p>It was noted that the photos do not need to be stored once the job has been completed. It was suggested that contractors may offer a cheaper rate where there is a photo as they can more easily manage risk.</p>
<p>Q13 Summary: The Working Group agreed that the provision of a photo could not be mandated as the systems to support this would need to be developed and it is outside of the scope of DCP 153. However, the group agreed that the provision of photos may provide significant benefits. The following phrasing was suggested:</p> <p>“The obligation is to report category B incidents and where possible photographs should be sent to support the report. “</p>		
Question 14	Should Distributors communicate the planned visit date to the Supplier?	Working Group Comments
AMO	n/a	
British Gas	We agree that Distributors should communicate the planned visit date to the supplier. This will provide the supplier with the potential to schedule a meter exchange visit on the same day thereby reducing inconvenience for the customer.	Noted
EDF Energy	<p>EDF Energy believes that Distributors must communicate the planned visit date to the Supplier. We are responsible for managing that customer and will usually be their first point of contact so awareness of the visit is vital to being able to deal with any queries that might arise.</p> <p>We believe that the Distributor should indicate not only the planned visit date but also the appointment time band that has been agreed with the customer. In order to minimise the disruption to the customer, we believe that there should be an aspiration to be able to carry out joint appointments between the Network Operator and the Meter Operator; however we recognise that the feasibility of this is currently limited. If Suppliers are aware of the times that the Network Operator will call then they will be able to manage the corresponding Meter Operator appointment with the customer to minimise disruption. For example, if the Network Operator has arranged an AM appointment then the Supplier may be able to arrange a PM appointment so the customer only has to take one day off work.</p> <p>We would further recommend that defined timescales are implemented for the</p>	Noted

	<p>notification of the planned visit date. We would recommend that the D0126 is sent within 5 working days of the appointment being arranged with the customer, even if the appointment is within the next 5 working days and may have already occurred by the time the flow is received by the Supplier.</p> <p>We would additionally note that the timescales for rejecting a D0135 must also be clear and consistent, and allow for the timely resolution of the issue to ensure the customer has the right experience. If there is a delay in rejecting the D0135 then this will delay any further actions required (by the Supplier or the Network Operator) that will allow the customer's meter to be exchanged, which will have a negative impact on the customer experience.</p>	
ENWL	Subject to any IT constraints we would aim to communicate the visit/outturn to suppliers as soon as reasonably practicable where at all possible, however this is not essential and should not be a specific obligation.	Noted
EON Energy	Yes this is reasonable, as it gives Suppliers the opportunity to schedule the re-visit by the MOP at the same time or as close to the Distributor visit as possible to enable the best possible customer experience and not to delay the benefits to the customer from smart metering. The visit should be scheduled ideally in a two hour slot, but at the very minimum as an am/pm appointment as defined in guaranteed standards.	Noted
GTC	We do not believe this is necessary as the supplier will not need to prepare for our visit and places an unnecessary administrative burden upon ourselves.	Noted
Northern Powergrid	No - We see no business reason for this and it may lead to unnecessary additional administration.	Noted
Npower	Yes in the case of category A (which would normally be within the same day) it is not required or necessary and category B we believe this would provide the customer with a better experience and some recovery of engagement after an initial failure of the meter exchange.	Noted
SP Manweb Plc and SP Distribution Ltd's	SPEN agree that the Distributor should communicate the planned visit date to the customer, hence the requirement that MO's capture an up to date contact number while on site and send via the D0135.	Noted
SSE Energy Supply Ltd	Whilst there is benefit in coordinating the activity of Distributors and Meter Operators, the initial visit may not fix the reported issue and this could result in a	Noted

	wasted Meter Operator appointment.	
SSEPD	No. This should be via less formal bilateral agreements between Suppliers and DNOs. The first visit of the DNO might not result in resolution of the fault. This could be better managed locally for the customer between Industry parties.	Noted
UKPN	The cost/benefit rationale for obliging distributors to do this has yet to be established.	Noted
Western Power	<p>Ideally the DNO and Supplier visits would be co-ordinated in order to minimise any inconvenience to the Customer. To be truly convenient, the Supplier visit would have to happen not only on the same date as the DNO visit, but also within a very short period of time afterwards. This will be logistically quite challenging to realise in practice.</p> <p>It would be possible for DNOs to communicate the planned visit date and time (see Q15 also) to a single central point within each Supplier organisation. This would only be worthwhile if Suppliers are confident they could make arrangements with their Meter Operator for an operative to be dispatched to site towards the end of the DNO visit.</p>	It was suggested that supplying the information would only be sensible if MOPs could visit at the same time or soon after. It was highlighted that more informal local arrangements between the DNO operative and the MOP may aid this as people build up relationships; however, notification of the appointment is needed to facilitate this.
Q14 Summary: The group noted that the majority view of the consultation respondents and those present at the meeting was that it is reasonable to send notification of the appointment. It was agreed that the timescales still need to be determined and may not necessarily be within 10 working days.		
<b>Question 15</b>	<b><i>Distributors: How do you envisage scheduling these appointments, would it be am/pm (as defined in the guaranteed standards documentation), all day or a two hour slot?</i></b>	<b>Working Group Comments</b>
AMO	The GS Reg 19 allow the customer to have a 2 hour time slot <a href="http://www.legislation.gov.uk/uksi/2010/698/regulation/19/made">http://www.legislation.gov.uk/uksi/2010/698/regulation/19/made</a>	It was noted that if the customer asks for a two hour slot they must be given it.
British Gas	N/A	
EDF Energy	Not applicable	
ENWL	This would be in accordance with the guaranteed standards already in place.	Noted
EON Energy	N/A	
GTC	All day	Noted
Northern Powergrid	We already offer time banded appointments for certain programmed works on an am/pm basis and in principle we would look to maintain this. However the	Noted

	scheduling arrangements for any increased level of defect reporting will need to be considered in detail and would depend on the robustness of granular geographic volume forecasts from suppliers.	
Npower	It would help the supplier if the DNO confirmed the time of asset change so that the meter exchange could be planned on the same day to follow after the service work. It would also be helpful if generally the appointments were restricted to 16:00hrs to deliver the vast bulk of their remedial works within a core set of hours between 8am – 4pm to allow the meter change to follow within a reasonable time of day. If the customer requires a DNO visit to be carried out later then there needs to be an understanding that there may be a knock on effect in that the MOP job is very unlikely to be scheduled and resolved that same day.	Noted
SP Manweb Plc and SP Distribution Ltd's	SPEN envisage that we would schedule these appointments as per our current process, whereby we offer an am or pm appointment.	Noted
SSE Energy Supply Ltd	Not applicable	
SSEPD	am/pm slots	Noted
UKPN	We would tend to use am/pm or all day.	Noted
Western Power	When we need to visit a Customer they will be offered an appointment which is either am/pm or within a two-hour time band.	Noted
Q15 Summary: It was noted that the vast majority of respondents provide am/pm slots but that a two hour slot must be provided if asked for. The group agreed that as far as the SLAs are concerned it just needs to be stated that the appointment information should be provided. There does not need to be any change to current scheduling practices.		
<b>Question 16</b>	<b>How could Distributors provide this information to Suppliers if not via the D0126?</b>	<b>Working Group Comments</b>
AMO	A new DTN flow? Need to consider Change of Supplier. The customer can change supplier at any time, so please consider that the report may be made by Supplier A & Meter Operator A, by the time the issue is worked upon the current appointed supplier is Supplier B & Meter Operator B. All reporting is sent the currently appointed supplier/MO – <i>not</i> the original reporting parties. New Supplier/MO may receive reports of completed work of which they were	It was noted that the Working Group's assumption was that the D0126 (Action Taken to Make Safe) flow would be amended. It was noted that change of supplier issues are ongoing and there is an Exelon work shop scheduled to discuss change of supplier issues.

	<p>completely unaware. The attached guidance highlights these issues.</p> <p>If work was scheduled by Supplier/MO in advance the outgoing supplier/MO would need to cancel as they are unable to do the work for supplier B. These few scenarios could all be resolved if there is sufficient desire, but is it becoming too complex? See also response to Q17</p>	
British Gas	We would prefer to exchange information via industry flows as they provide British Gas with an opportunity to capture information in our systems so that front line advisors are aware of progress and can resolve any customer queries without referring the call around British Gas. The confirmed appointment date/time should be communicated within an amended D0126 and D0135.	Noted
EDF Energy	EDF Energy believes that the D0126 is the only viable route for the provision of this information; there is no other dataflow that would be suitable for this purpose and any solution that does not involve dataflows but some other communication (such as e-mail) can not be regarded as being robust.	Noted
ENWL	To be determined when we understand the requirements should the D0126/135 need upgrading further.	Noted
EON Energy	This sort of information is best sent via dataflow, but it could possibly be trialed as an email to a dedicated address.	Noted
GTC	<p>If the visit is not to be communicated via a D0126 flow then e-mail would be the next logical choice. E-mail may be the better choice for this communication as the D0126 does not currently have the facility for distribution businesses to send appointment times which would mean another change to MRA/DTC. It would also need to be scoped how changes to appointment times would be communicated etc.</p> <p>The potential downside to e-mail versus a change to D0126 would be that e-mail would not have an official audit trail and the content would not be consistent.</p>	Noted
Northern Powergrid	The supply of information via the D0126 flow has already been agreed elsewhere and we do not see a need to provide an alternative communication method at this time.	Noted
Npower	There are no suitable practical alternatives considering the expected increase in volumes. Telephone calls and xl spreadsheets are not considered suitable.	Noted
SP Manweb Plc and SP	As a Distributor, we would have no way of notifying the appointment time to Suppliers if not via the D0126.	Noted

Distribution Ltd's		
SSE Energy Supply Ltd	Any communication of appointment slots would have to be bilateral or require a change to the MRA create new or modify existing flows.	Noted
SSEPD	The D0126 is not used for this purpose reference DTC CP3336. This would need a change to the MRA. Please refer to question 14 response	Noted
UKPN	D0126 is preferable if we had to do this.	Noted
Western Power	<p>D0126 data flows are not suitable for sending this time and date information in their current form.</p> <p>A new data flow could be created specifically for this purpose, although this will entail system changes for both DNOs and Suppliers, which would take time to implement. It would also be necessary for other organisations (MRA, MOCOPA etc) to consult and agree to these changes.</p> <p>Alternatively, Suppliers could provide a single telephone number / email address which DNO responders could call / email with this information.</p>	Noted
Q16 Summary: The working group agreed that an amended D0126 is the best way forward.		
<b>Question 17</b>	<b>An alternative is that the Distributor does not inform the Supplier of the scheduled visit date, but only notifies the Supplier once the job is complete. Is this Alternative reasonable?</b>	<b>Working Group Comments</b>
AMO	This was the approach taken in developing the flows. Although work may be scheduled for a future date it may not occur for a range of reasons, including emergency network faults, as well as the more mundane sickness and traffic delays. The design was to inform the currently appointed Supplier & MO that the work was complete, when the work <i>is</i> complete. Only then could the Supplier/MO confidently reschedule metering work. This is a judgement call on the confidence of future schedule dates being met. If this is the approach adopted then there may need to be a SLA monitoring scheduled vs actual work completed.	Noted
British Gas	We do not believe this is reasonable as it does not move us that far forward from	Noted

	where we are today. If suppliers are not provided with a scheduled visit date then a third visit will be required to complete the meter exchange i.e. first visit aborted, second visit DNO completes work, third visit meter exchanged.	
EDF Energy	EDF Energy believes that this alternative is not reasonable for the reason detailed in the response to question 14.	Noted
ENWL	Yes, it is important that the distributor notifies the supplier that the work has been undertaken regardless of whether the supplier was notified of the visit beforehand.	Noted
EON Energy	No for the reasons already given, this is poor customer service and does not allow Suppliers to comply with their obligations to keep customers informed. Our experience from other works that Distributors carry out, such as disconnections, is that we do not receive notification in a timely manner. In fact we can spend more than 2 years chasing flows that have not been sent when a job has been completed. By knowing the scheduled date we will know if a flow has not been sent and to chase it. Without a scheduled date we have no idea if a job has been carried or the request has even been auctioned by the Distributor.	Noted
GTC	We believe this is a reasonable alternative, as distribution businesses would still be bound by the SLA. We would only require supplier assistance should there be an issue therefore this would cut down on unnecessary administration sending appointment dates.	Noted
Northern Powergrid	Yes - It would be hoped that the incident/defect could be resolved on the first visit but this may not always be the case and it would seem prudent for the supplier to hang its processes on the completion of DNO/LDNO works rather than trying to anticipate successful visits.	Noted
Npower	If it is not practicable to provide confirmation of the visit date/time window prior to the visit taking place, then notification of completion is essential as a minimum provision, but this is not our preferred option.	Noted
SP Manweb Plc and SP Distribution Ltd's	SPEN would agree that as the D0126 is only issued once the job is complete, the alternative is a reasonable proposal.	Noted
SSE Energy Supply Ltd	The alternative is reasonable.	Noted
SSEPD	The supplier should be informed via the D0126 only once the works have been	Noted

	completed as per DTC CP3336 or the request for works have been rejected as incorrectly reported.	
UKPN	This appears to be the current requirement and so has been deemed reasonable by the industry. It is unclear why this is an alternative.	
Western Power	Yes. DTC CP 3336 requires the Supplier to be notified only once the job is complete (or is disputed). This alternative would mean that the DCUSA and MRA processes are in alignment.	
<p>Q17 Summary: It was noted that the majority of respondents were supportive of not notifying in advance. The Working Group discussed this and agreed that this would work against acting positively to enhance the customer experience.</p> <p>It was noted that DNOs sometimes need to make a first visit and then return to resolve the issue. The greater the amount of information provided by the MOP, the more likely that the job will be completed on the first visit. If the visit is booked and the flow to the Supplier sent then if the job cannot be completed by the DNO there will be feedback, which over time should help to improve the information passed to the DNO.</p> <p>The group concluded that a singular D0126 flow should be sent. If later visit dates are required then a further D126 is not required. The more information that is provided the less risk there will be that further visits will be needed.</p>		
<b>Question 18</b>	<b>It proposed that reporting on performance against the SLAs should be within 15 working days of the end of each calendar month on jobs completed within the month. For example, for jobs completed in January were each of those jobs completed within the SLAs. Do you agree with this proposal? If not, what alternative would you suggest?</b>	<b>Working Group Comments</b>
AMO	How are the jobs that <i>should</i> have been completed in the month reported? For example, a job that was reported which required completion in the reporting month, but it still outstanding/overdue? Is part of the report showing number completed within SLA, and those over due by 0-30, 31-60, 61-90, more than 90 days. With SLA seeking that [95] % of reports are resolved within SLA requirements, remaining [5] % within following [60] days?	It was noted that if they should have been done within that month then they should be reported in that month's figures. It was agreed that a specification document defining how the reporting should be completed will need to be produced ( <b>ACTION</b> ).
British Gas	We agree with the proposed timescales for reporting.	Noted
EDF Energy	EDF Energy agrees with the proposal for reporting within 15 working days of the end of the month; however we believe that the reporting should not only reflect the jobs completed in a month, but also the jobs that should have been completed in the month (based on the 40 working days SLA) but which are still outstanding at the	Noted

	<p>end of the month.</p> <p>This is in line with current standards for PARMs reporting under the Elexon Performance Assurance Framework. If these outstanding cases are not counted, then there is actually a perverse incentive never to resolve them as they would not appear on a report; once resolved they will be counted as a failure.</p>	
ENWL	We believe that quarterly reporting is sufficient and do not see what benefits more frequent reporting brings.	Noted
EON Energy	Yes	Noted
GTC	This seems reasonable	Noted
Northern Powergrid	Yes - This seems reasonable, as long as the internal reporting mechanism along with all the other supporting mechanisms, including detailed, accurate and up to date volume forecasts and measures for any incorrect defect reports, were designed and put in place in time.	Noted
Npower	Agreed.	Noted
SP Manweb Plc and SP Distribution Ltd's	SPEN agree with the proposal that reporting on performance against the SLAs should be within 15 working days of the end of each calendar month on jobs completed within the month and feel this is a reasonable time assumption.	Noted
SSE Energy Supply Ltd	We agree with the proposed approach on reporting.	Noted
SSEPD	Agreed	Noted
UKPN	<p>A minimum of a month is used for other reporting requirements.</p> <p>We suggest 25 working days.</p>	Noted
Western Power	<p>Reporting should preferably be on a quarterly basis.</p> <p>DNOs have to submit cost information to the DCUSA Secretariat on a quarterly basis (Clause 35A) and it is suggested that a similar approach is adopted for these reports. The same timescales should also apply, namely, reports to be submitted by the fifth Working Day of May, August, November and February in each year.</p> <p>There should also be a requirement for the Secretariat to publish these reports on the DCUSA website within three working days of receipt.</p>	Noted
Q18 Summary: It was noted that one respondent supported 25 days and the other respondents were happy with the proposed 15 WDs. Two respondents		

<p>were supportive of reporting on a quarterly basis rather than monthly.</p> <p>It was highlighted that DNOs require time to ensure that they have good quality data. It was also highlighted that one month would be similar to other industry requirements.</p> <p>After discussion the group agreed that reporting should be within 15WDs of the end of each month.</p>		
<b>Question 19</b>	<b>It is proposed that reporting should be per Distribution licence held per month. Do you agree with this proposal? If not, what alternative would you suggest?</b>	<b>Working Group Comments</b>
AMO	Yes	Noted
British Gas	We would prefer reporting by supplier measured against the Distribution Licence area total.	It was clarified that it the respondent would like per supplier per distribution area. It was noted that there are around 50 Supplier Ids.
EDF Energy	<p>EDF Energy believes that any performance information in relation to the proposed SLAs should be published at a Distribution licence level.</p> <p>However it should be possible for reporting to be provided on request at different levels within this; for example we would want to understand what the performance for each Network Operator was for the MPANs we supply so that we can verify this against our own reporting and understand any dispensaries. Reporting must also be available at a GSP Group level for any Network Operator that operates in multiple GSP Group areas in order to identify and understand any geographical discrepancies in performance against the SLAs.</p> <p>Again, in line with the current standards for PARMS reporting under the Elexon Performance Assurance Framework, we would recommend that Network Operators are required to maintain a set of drill-down data for each summary report issued that can be requested and analysed in order to be able to resolve any discrepancies between Network Operator and Supplier views of performance against SLAs.</p> <p>Of paramount importance is that the requirements for reporting are made very clear and are applied consistently across all Network Operators. We have found from previous experience that any ambiguity in the definition of reporting requirements, specifically in regards to self-reporting, can make the figures reported effectively meaningless and management of performance impossible.</p>	Noted
ENWL	We agree with 'Per licence' reporting.	Noted
EON Energy	Yes	Noted

GTC	We agree with this proposal although an alternative would be to report per distribution licence per GSP group, to gain granularity on any potential geographic issues.	Noted
Northern Powergrid	Comment as per Q18 response	Noted
Npower	Agreed.	Noted
SP Manweb Plc and SP Distribution Ltd's	We agree that reporting should be per Distribution licence held per month and acknowledge that the majority of our reports are currently in this format.	Noted
SSE Energy Supply Ltd	We agree with the proposed approach on reporting.	Noted
SSEPD	Agreed	Noted
UKPN	This seems sensible.	Noted
Western Power	WPD does not agree with this proposal. Both DNOs and Suppliers should have to report on their respective performance (See Q21 below). Reporting should be on a per licence basis i.e. DNOs per distribution licence and Suppliers per supply licence. The reporting period should be quarterly (See Q18 above).	The working group noted that to report for 50 suppliers over 14 areas within 15 WDs would be unreasonable.
Q19 Summary: The Working Group agreed that there should be one report per distribution area. It was noted that suppliers have the data available should they want additional information.		
<b>Question 20</b>	<b>Do you agree that the SLA reporting should state for each Distribution licence held per month whether or not the SLA was met? If not, what alternative would you suggest?</b>	<b>Working Group Comments</b>
AMO	Is the reporting by currently appointed Supplier, and/or by Meter Operator within each Distribution licence area? Would not expect a Yes/No report, but a more numerical report with the opportunity to list each MPAN so that any difference of views can be resolved.	The group discussed whether a percentage met was a more reasonable way of reporting than yes/no. It was agreed that reporting should in principle be by percentage that met the SLA.
British Gas	We would prefer more granularity within the reporting. We would want to know for each month how many were also completed outside of SLA and how much outside	Noted

	of SLA each job was.	
EDF Energy	The SLAs, as proposed within the change proposal, are on an individual incident basis; any reporting can only therefore be on aggregated performance against those SLAs. We believe that this performance would be best expressed as a percentage; a Network Operator therefore can only be regarded as meeting the SLAs if their reported performance is 100%.	Noted
ENWL	It would be appropriate to report quarterly broken down monthly. Reporting should be in aggregate not on a supplier by supplier basis.	Noted
EON Energy	Yes.	Noted
GTC	We agree	Noted
Northern Powergrid	Yes - DNOs will need performance metrics agreeing, as 100% performance for category B work may not be possible due to operational and business constraints. A reasonable measure of compliance with the SLA could be that performance delivery was at 80 or 90% of the SLA targets.  We would be happy to provide SLA reporting, although we would wish to avoid sending each supplier a disaggregated report.	Noted
Npower	Agreed.	Noted
SP Manweb Plc and SP Distribution Ltd's	The proposal that SLA reporting should state for each Distribution licence held per month whether or not the SLA was met is reasonable and we would agree with this.	Noted
SSE Energy Supply Ltd	We agree with the proposed approach on reporting.	Noted
SSEPD	Agreed	Noted
UKPN	It is unclear quite what is being proposed. At face value this could be a yes/no answer. It would seem sensible to state volume or percentage of jobs passed or failed. If the service levels are based on a percentage rate of success then the reporting could state the percentage achieved against a volume by Category.  Reporting should be able to recognise any volume constraint mechanism whereby requirements are waived or relaxed such that it is clear that if on a purely numeric level the SLA was not met this was permitted and so is not a failure.	Noted
Western Power	WPD does not agree with this proposal.	Noted

	<p>Both DNO and Suppliers should have to report on their performance on a per distribution and supply licence respectively (See Q19 above).</p> <p>The wording suggests that the service level would not be met if a single incident was not completed in the required timescale. This seems unduly harsh given the predicted numbers.</p> <p>DNO reporting should state the number of incidents completed in the reporting period and the proportion which met the service level requirement. Supplier reporting should state the number of incidents completed and disputed in the reporting period and the proportion which were disputed. In both cases, the statistics should include overall totals and subtotals for Category A, B &amp; C incidents.</p> <p>The reporting period should be quarterly (See Q18 above).</p>	
Q20 Summary: The Working Group agreed that reporting should be in terms of percentage that met the SLA.		
<b>Question 21</b>	<b>Should the SLAs be reported by DNOs, Suppliers or both?</b>	<b>Working Group Comments</b>
AMO	<p>Reporting by DNO with monitoring by suppliers. DNOs are best placed to do this reporting as they will have a record of all reports in there area, those received by telephone and by DTN flows.</p> <p>Distributors reporting by currently (at time of report) appointed Supplier, within each Distribution licence area.</p>	Noted
British Gas	SLAs should be reported by the DNOs	Noted
EDF Energy	EDF Energy believes that the only published reports should be those generated by Network Operators; however it is likely that Suppliers will maintain their own reporting as well, in order to get their view of the performance of each Network Operator for the MPANs they supply. In line with the response to question 19, we believe that DNOs must be required to provide drill-down data on request to be able to resolve any discrepancies in Supplier and Network Operator views of performance.	Noted
ENWL	<p>DNOs should report on their performance.</p> <p>We also need an SLA on the quality of information passed to us by the Suppliers and their MOPs, e.g. % of Category A reports that were actually emergencies. Suggest this is by DNO area.</p>	It was noted that the SLAs that supplier's performance would be reporting on would be the mis-reporting of category A, B and Cs.

EON Energy	Both	Noted
GTC	Both	Noted
Northern Powergrid	We are unclear what is meant by this question, if this question is about performance against the SLA then who is it proposed that performance is reported to? Is it proposed that DNOs report performance to individual suppliers on a bilateral basis?	Noted
Npower	As the proposal is that DNO's are expected to report on SLA's then it seems reasonable to expect the supplier to respond on two categories. 1) Number of outstanding D126 closure responses as a result of a supplier D135 request outside the 40 day window. 2) Number of follow up appointments not closed on the same day as the DNO D126 appointment notification.	Noted
SP Manweb Plc and SP Distribution Ltd's	We feel that SLA's should be reported by Suppliers as this is essentially a Supplier driven activity. SPEN would envisage that would keep our own internal reporting functions in relation to DCP 153 objectives and activities.	Noted
SSE Energy Supply Ltd	We believe reports should be broken down by both DNO and Supplier.	Noted
SSEPD	Both	Noted
UKPN	It would seem that the distributor must report this as each may have different views. The service levels are about completing the work. If a job has been done the flow may yet to have been sent. There could be timing differences. Jobs completed at the end of a month may not yet have had a flow sent in that month.	It was noted that this was a valid point that would prevent Suppliers reporting on DNO performance.
Western Power	Both. DNOs should report on their performance (resolution of incidents within requisite timescales) and Suppliers should report on theirs (incorrect reporting of incidents).	
Q21 Summary: The Working Group agreed that performance against the SLAs should be reported only by DNOs. It was noted that Suppliers would be reporting on their own performance in terms of misreporting category A, B and C incidents.		
<b>Question 22</b>	<b>The Working Group proposes that the following is reported each month:</b> <b>The percentage of category A incidents that were incorrectly reported</b> <b>The percentage of category B incidents that were incorrectly reported</b>	<b>Working Group Comments</b>

	<p><b>The percentage of category C incidents that were incorrectly reported</b></p> <p><b>Do you agree? Please provide your rationale.</b></p>	
AMO	<p>There is no process defined to define 'incorrect'. Current anecdotal evidence shows that MO reports an issue 'in good faith' but Distribution Business deems it not to be an issue. In the implemented design the Distribution Business can 'reject' a report, but this may then lead to a discussion (outside of the DTN) to resolve the difference of opinion. This may result in the distributor attending to the issue, or the MO accepting that it is rejected. Either of which may lead to further training to staff within either of the parties, or additional guidance as new scenarios are identified.</p> <p>Meter Operatives are employed to change meters, there is no value in reporting issues to Distributors which are not within the distributors control to resolve.</p>	<p>The group agreed that they were not looking at rejected reports, but rather incidents where DNOs get to site and find that the incident is not the category that was reported.</p>
British Gas	<p>Where incidents are incorrectly reported this information should be fed back to suppliers/meter operators on an individual basis. We agree that a summary report should be provided to each supplier showing what percentage of incidents were incorrectly reported.</p>	<p>It was noted that suppliers should have this information and will be obliged under the SLAs to report on how many they have been informed were incorrect.</p>
EDF Energy	<p>EDF Energy supports the reporting proposal in regard to incorrectly reported incidents; however we believe that the overall number of incidents that were reported in the period needs to be provided to put the percentage into context. If only one incident is reported in a category and that is incorrect, that would give a very misleading view of performance.</p> <p>In line with responses to previous questions, Network Operators must be required to provide drill-down data on request to be able to resolve any discrepancies in Supplier and Network Operator views of performance.</p> <p>It needs to be recognised that asset condition reports will be generated based on the individual operative's assessment of the situation and their level of experience and competency. It is therefore essential that there is a continual feedback process between Meter Operators and Suppliers in regard to any incidents that have been incorrectly categorised so that this can be fed back into training and communication processes in order to prevent re-occurrence.</p> <p>In order to ensure a consistent approach to the reporting and categorisation of incidents within this process across all Meter Operators we would strongly</p>	<p>Noted</p>

	recommend that this is specifically included in the training to be delivered to meter installers by the National Skills Academy for Power (NSAP).	
ENWL	Yes number of instances by Category by supplier to enable billing transactional charges for abortive visits. An obligation on suppliers to report erroneous instances found per category would enable a better industry understanding of agent performance.	Noted
EON Energy	Yes this would need to be per supplier id. This helps to keep track of where there may be operatives that need additional training. We would expect this data to be available per MPAN if requested by Suppliers.	Noted
GTC	We agree	Noted
Northern Powergrid	Yes - Where incidents are reported incorrectly such that the DNO/LDNO incurs unnecessary costs these costs should be funded by the supplier. In addition suppliers should be aware of the risk of inadvertently incentivising inappropriate reporting by meter operators (MOPS) and contractors through performance delivery incentives in contracts.	Noted
Npower	Agree. It should be considered that as reported Cat C meter points may not be visited by the DNO for many months, reports of incorrect reporting under Cat C may not be responsive to when the D135 was sent to the DNO so any subsequent remedies may take several months to have a desired effect.	Noted
SP Manweb Plc and SP Distribution Ltd's	From a SPEN perspective, we agree that the percentage of category a, b and c incidents that were incorrectly reported should be included. This will help reduce Suppliers potentially misreporting incidents in order to fast track the work. The use of the 'Dispute' flag on the D0126 will allow DNO's to report this easily.	Noted
SSE Energy Supply Ltd	We agree with the proposed approach on reporting.	Noted
SSEPD	Agreed this should be reported for each Supplier	Noted
UKPN	Might be better to report as a matrix; Jobs reported as A that were B Jobs reported as A that were C Job reported as A that should not have been reported	The group discussed whether it should be made anonymous. It was suggested that if the information is between parties it should be not be anonymous. It was noted that reporting against other industry standards were not anonymous. The

	<p>Jobs reported as B that were A</p> <p>Jobs reported as B that were C</p> <p>Job reported as B that should not have been reported</p> <p>Jobs reported as C that were A</p> <p>Jobs reported as C that were B</p> <p>Job reported as C that should not have been reported</p> <p>It might also be preferable to report by (anonymised) supplier to see whether these issues are widespread or localised.</p>	group agreed that the information should not be anonymous for either DNOs or Suppliers.
Western Power	<p>Partly.</p> <p>The reporting period should be quarterly (See Q18 above).</p> <p>WPD agrees with the content of the report (See Q20 above).</p>	Noted
Q22 Summary: The Working Group noted that most respondents were supportive of providing this information. It was agreed that reporting should not be anonymous.		
<b>Question 23</b>	<b><i>Distributors: How soon would you be able to meet the SLAs for the work to done?</i></b>	<b>Working Group Comments</b>
AMO	N/A	
British Gas	N/A	
EDF Energy	Not applicable.	
ENWL	<p>This is volume dependent but once defined and funding mechanisms agreed but probably 6-12 months to recruit and train staff.</p> <p>Volumes and locations together with funding within this price review and the next price review need to be considered.</p> <p>The additional SLA are outside the current price control, any activity pre 2015 would need to be self funding via the supplier.</p>	Noted
EON Energy	N/A	
GTC	Immediately as we already strive to adhere to the targets proscribed	Noted
Northern Powergrid	Given the acceleration of asset replacement we expect to arise from smart meter roll-out, as endorsed by independent analysis by NSAP for DECC, we cannot guarantee to meet any service level until we have recruited and trained the appropriate staff. In turn, this requires confidence of securing appropriate funding	Noted

	<p>from Ofgem.</p> <p>This will also depend on the detail of the volume forecasting arrangements that will need to be put in place to support SLAs, noting that DNOs are already addressing issues that occur from conventional and smart meter replacement activity.</p>	
Npower	DNO Response.	
SP Manweb Plc and SP Distribution Ltd's	<p>As per earlier comments in Question 11, SPEN have an urgent requirement to get sight of the Supplier driven installation volumes in order to determine the expected volume of work which will impact upon how soon we would be able to meet the SLA's.</p> <p>In the absence of volumes we cannot estimate the potential impact which is of real concern to us as a DNO.</p>	Noted
SSE Energy Supply Ltd	Not applicable	
SSEPD	<p>The requirements to meet any SLA's i.e. reporting mechanisms, staffing levels, increased workload and costs are not included in the current price control settlement.</p> <p>Discussions regarding the next price control review period are at an early stage and whilst the issue of smart metering related costs will be included, uncertainties regarding the scale of supply point defects that will be encountered are likely to complicate the process.</p> <p>It is difficult to see how the SLA's being discussed in this consultation could be met until the issues surrounding funding/ price control settlements are resolved.</p>	Noted
UKPN	N/A	
Western Power	<p>This is directly related to the rate at which incident notifications are received and the resources available to deal with them.</p> <p>Electricity distribution is a regulated industry whose funding is determined by the Regulator for a particular price control period. The submission for last price control review (DPCR5) did not include any requirement associated with the rollout of smart metering. The next price control review (RIIO-ED1) has yet to be agreed.</p> <p>It requires many months to recruit, train and develop any new member of staff up to the requisite competence levels.</p>	Noted

	<p>There is a great deal of uncertainty about the rate at which incident notifications will be received:</p> <ul style="list-style-type: none"> <li>• The analysis to date about the proportion of meter changes which will reveal a network defect is quite rough and ready. Any underestimation will result in a miscalculation of DNO resource levels</li> <li>• Supplier rollout plans upon which DNOs can estimate their resource levels are only indicative. Any slippage in the programme will result in the work being back-end loaded, leading to an underestimation of the DNO resource levels</li> <li>• It is unclear how Suppliers will roll out the meter changes. Will the changes be spread out fairly evenly across the distribution network area throughout the programme, or will a narrow geographic area be targeted at any one time. The latter approach would lead to an underestimation of the DNO resource levels in the targeted area</li> <li>• Will the Suppliers leave the more difficult meter changes to later on in the programme, resulting in the network defect rates being back end loaded. Again, this approach would lead to an underestimation of the DNO resource levels later on in the programme</li> </ul> <p>The fact that there is no agreed funding, no recruitment / training of additional staff taking place, and so much unpredictability about the rate at which defects will be received means that this is very unclear when WPD would be in a position to meet the SLA in practice.</p>	
Q23 Summary: The Working Group noted that the general consensus is that there is currently not enough information to provide a view on this.		
<b>Question 24</b>	<b>24. Distributors: How soon would you be able to meet the reporting requirements (e.g. implementation of systems to record required data)?</b>	<b>Working Group Comments</b>
AMO	N/A	
British Gas	N/A	
EDF Energy	Not applicable.	
ENWL	The requirement is not yet clear enough to give an accurate forecast.	Noted
EON Energy	N/A	
GTC	As we envisage a small number of incidents reported to us we believe that we will	Noted

	be able to meet the reporting requirements with little or no changes to the system therefore we should be able to start reporting in line with the implementation date.	
Northern Powergrid	The time period to achieve the reporting requirements will depend on whether the suppliers want consistency of reporting from the DNOs. If so, it will take time to agree this and then more time will be required if it is necessary to adapt systems to output to a common standard.	Noted
Npower	DNO Response.	
SP Manweb Plc and SP Distribution Ltd's	From SPEN's perspective, we do not have any immediate issues with the reporting requirements. We will be utilising our current systems and will soon begin building new reports featuring the job categories as advised by the MRA.	Noted
SSE Energy Supply Ltd	Not applicable	
SSEPD	This would be dependent on the SLA's being agreed and implemented. (as per question 23)	Noted
UKPN	This pre-supposes an outcome to question 21 and does not ask the same of suppliers.	Noted
Western Power	<p>The Change Proposal is rather vague on the requirements for reporting and consequently this is not straightforward to answer.</p> <p>Who has the report to be submitted to? (The Secretariat of DCUSA?)</p> <p>What level of detail is required and presented in what format? (The Change Proposal does not include a proposal for a new Schedule containing a proforma report)</p> <p>No definitive statement on whether:</p> <ul style="list-style-type: none"> <li>• Category C incidents have to be reported</li> <li>• Category B incidents have to be visited by one date and completed by another</li> <li>• Different service levels are required for particular sub-category incidents</li> </ul> <p>The more elaborate the service levels / reporting requirements:</p> <ul style="list-style-type: none"> <li>• The greater the complexity of the system changes needed to drive the business processes and to capture relevant data when work is completed /</li> </ul>	Noted

	<p>disputed</p> <ul style="list-style-type: none"> <li>• The longer it will take to design the changes and carry out system testing</li> <li>• The longer it will take to train staff</li> </ul> <p>WPD believes that both DNOs and Suppliers should have to report on their respective performance (See Q21 above) and consequently an equivalent to Q24 needs to be put to the Suppliers.</p>	
Q24 Summary: The Working Group noted that similar to Q23 the general consensus is that there is currently not enough information to provide a view on this.		
<b>Question 25</b>	<b>If changes to implement reporting could delay the implementation of the SLAs, would you be supportive of different implementation dates?</b>	<b>Working Group Comments</b>
AMO	The DTC changes should be implemented as scheduled in Dec 2012. Any progress on SLAs is welcomed. The implementation of the SLA should occur as soon as possible, even if there is no DNO reporting initially to monitor the performance. Suppliers and meter operators are likely to generate management information to indicate approximate achievement from Dec 2012 irrespective of this DCP	Noted
British Gas	Yes it is important to us to implement the SLAs as soon as possible. If system changes are required to provide detailed reporting requirements these could be implemented at a later date.	Noted
EDF Energy	EDF Energy supports separate implementation dates as we do not believe that there is any need to defer the benefits to be gained through the implementation of the SLAs. We would also support early implementation of the SLAs and associated processes to be able to identify any issues that arise when these are used in an actual operational environment, and resolve these before the mass rollout of smart meters commences.	Noted
ENWL	Yes. Cannot see the need for reporting to be linked to the service all this depends on the role out time frames.	Noted
EON Energy	Yes, reporting should not delay the implementation of the SLAs.	Noted
GTC	Yes	Noted
Northern Powergrid	Yes – It should also be noted that there may be delays in the implementation of the volume forecasting arrangements that would need to be an essential part of any proposed SLA arrangements.	Noted

Npower	No. Continue as proposed.	Noted
SP Manweb Plc and SP Distribution Ltd's	We would be supportive of different implementation dates. Whilst we fully support the principles of DCP 153, the ideal scenario is that both reporting and SLA's go live at the same time. If the implementation date needs to be pushed out to achieve this, SPEN agree with this.	Noted
SSE Energy Supply Ltd	Yes	Noted
SSEPD	Yes	Noted
UKPN	Reporting ought to be able to quickly feedback to suppliers the quality of requests they make and so a two stage approach could lead to bad practices becoming embedded before feedback has been received	Noted
Western Power	WPD would not wish to support this proposal. WPD believes that an SLA is futile unless there is also the means to measure performance against it.	
Q25 Summary: The Working Group noted that the majority of respondents do not believe that the SLAs should be delayed to allow for the implementation of reporting systems.		
<b>Question 26</b>	<b>It is the view of the Working group that the environmental impact associated with DCP 153 is negligible. The roll out of smart meters is mandated, therefore, the introduction of SLAs will not change whether or not premises need to be visited to exchange meters. The SLAs may have a slight impact on timescales but the environmental impact is negligible. Do you agree?</b>	<b>Working Group Comments</b>
AMO	For Cat B & C yes. For Cat A – no as the Meter Operative may be required to remain unproductive at site until the Distribution Business staff attend. NSAP assumptions are that 1% of visits will result in Cat A report, 3% Cat B and 2% Cat C. Stakeholders have a range of views on these assumptions, implementation of the flows in Dec 2012 will help substantiate these numbers, although it may take some months to settle to a consistent level.	The Working Group noted that they did not see how this would change the environmental impact.
British Gas	We agree that the environmental impact is negligible.	Noted
EDF Energy	EDF Energy agrees that the environmental impact of this change proposal is negligible.	Noted

ENWL	Agree, but the amount of travelling by MOPs and DNOs and wasted time for the customer would be avoided if MOPs/Suppliers could undertake some of their own cut-out changes where appropriate, following authorisation by us .	Noted
EON Energy	If this DCP is implemented we agree. If not leaving the Distributor an open ended timescale to rectify faults could have a significant environmental impact.	Noted
GTC	Agreed	Noted
Northern Powergrid	Yes	Noted
Npower	Yes	Noted
SP Manweb Plc and SP Distribution Ltd's	SPEN agree that although the SLAs may have a slight impact on timescales the environmental impact is negligible.	Noted
SSE Energy Supply Ltd	We agree with the high-level environmental assessment.	Noted
SSEPD	Agreed	Noted
UKPN	Yes	Noted
Western Power	Yes	Noted
Q26 Summary: The group agreed that the environmental impact of the Change Proposal is negligible.		
<b>Question 27</b>	<b>Do you have any further comments?</b>	<b>Working Group Comments</b>
AMO	I apologise for the lengthy response, but having been involved in this debate since its inception several years ago many of the discussions have already occurred. That is not to say that the conclusion of previous discussions are now correct, but need to ensure that this DCP does not seek to completely re-engineer the solutions about to be implemented.	The group agreed that DCP 153 is building on work not re-engineering.
British Gas	If suppliers are provided with a scheduled date by the DNO and for what ever reason the DNO has to cancel or reschedule the visit, the supplier should be notified as soon as possible. It is important that ownership of the customer journey is identified for these scenarios at the outset. When the DNO agrees with the customer a suitable appointment the supplier should be notified and kept updated with any amendments. It is likely that the customer will raise any queries or	It was noted that contact details are outside of the scope of the change.

	complaints with the supplier so we ask for dedicated contacts within each DNO who our staff can contact should any need arise. Escalation contacts will also be required where we can contact DNOs particularly where faults are not rectified within the agreed SLA's.	
EDF Energy	Although it is not in the scope of the DCUSA, it is worth noting that, from a Supplier point of view, alignment between the electricity and gas processes and standards of performance would be desirable; we need to be able to deliver a consistent experience to our customers irrespective of the fuel that we supply to them.	It was noted that this sits outside of the scope of the change.
ENWL	Yes We do not have sufficient information on the role out plans, volumes, locations etc. which makes it difficult to provide a proper response to several of the questions raised. New meter operator staff will no doubt increase thus the number of issues will increase due to the level of "new skill set" which could have a further impact on volumes. The provision of 24/7 MOP and customer service contact centre cover for smart meter role out also needs to be considered as some distributors will not attend meter related issues thus affecting the overall customer service to end users who have say recently had a smart meter fitted.	It was noted that MOP contacts are being addressed elsewhere.
EON Energy	No	Noted
GTC	It may be appropriate to have a specific template of how each distributor/party would report the data. This would lead to greater consistency and less inaccuracies. We are aware that MOCOPA have issued a guideline document regarding the use of the D0135 & D0126. Whilst the document is only described as a guideline it appears to be potentially diverging from DCP153. Liaison with MOCOPA may be worthwhile to ensure that the same process will be followed by all interested parties.	It was agreed that a template will be produced.
Northern Powergrid	Yes - Northern Powergrid is fully committed to supporting an efficient smart meter roll-out and our active participation in working groups on the SMETS, operational issues and customer engagement is clear evidence of this. If arrangements for SLAs for network defect are viewed as necessary to smooth roll-out then such arrangements should address and balance the needs of all the parties involved. In terms of success factors the group should establish some performance metric	Noted

	<p>targets whereby the achievement of which means compliance with the SLA, for example achieving 80 or 90% performance for category B work within the SLA should be treated as compliance because hitting 100% may not be possible or at least not an appropriate/cost effective use of resources. However achieving a 100% performance for category A safety issues may indeed be appropriate.</p> <p>We feel the proposed changed should be on a more reciprocal basis to address more of the DNOs likely issues and reasonable requirements. We therefore believe that there is more work to be done by the working group.</p>	
<p>Npower</p>	<ul style="list-style-type: none"> <li>• We would like to ensure the SLA's are responsive to any Cat A and B needs for traditional as well as Smart metering exchange/maintenance work.</li> <li>• Assuming that DCP127 (Gas First Smart Meter Installation) is approved, how will gas meter installers notify DNO's of issues associated with the DNO's assets and will these be subject to the same SLAs?</li> <li>• Assuming that DCP127 (Gas First Smart Meter Installation) is approved, should gas meter installers notify electricity suppliers/meter operators of issues associated with the DNO's assets that may prevent the electricity meter exchange?</li> </ul>	<p>It was noted that for the second bullet point email would need to be used for category Bs or they could go back to the Supplier. Category As are covered by telephone.</p>

<p>SP Manweb Plc and SP Distribution Ltd's</p>	<p>SPEN have a few additional comments with regards to DCP 153 that we would appreciate if these could be taken into consideration with our response.</p> <p>No access at DNO appointment</p> <p>There does not appear to be any guidance around the process where there is no access on the DNO appointment. In this instance, what happens to the SLA of 40 working days?</p> <p>Customer refusal to allow access</p> <p>The SLA's do not provide any guidance for instances where customers refuse DNO access, either to examine their own service position or prevent access where the neighbours service position may be in another property.</p> <p>NRSWA requirements</p> <p>There appears to be no provision within the SLA's for instances where DNO's are required to apply for NRSWA's. Potentially applying for NRSWA's can take up to 30 days, so DNO's may not manage to achieve the 40 working day SLA.</p> <p>Stop the clock functionality</p> <p>The SLA's do not provide any mechanism to stop the clock on the SLA's. This may be in relation to a job that requires specific treatment – e/.g – outages to a full block of flats may need to be organised or a job may require deep excavations in the street. Whilst we would endeavour to meet the 40 working day SLA, it is anticipated that there may be instances such as the above where it may be physically impossible, and wondered if a stop the clock functionality had been considered?</p> <p>Penalties</p> <p>With regards to a failure of an SLA, we would welcome further clarification on the penalties that may be imposed on DNO's for breach of these conditions? There does not appear to be any listed within the Consultation and wondered if there were any being considered.</p>	
<p>SSE Energy Supply Ltd</p>	<p>We have no further comments.</p>	
<p>SSEPD</p>	<p>Additional requirements to be considered:</p> <ul style="list-style-type: none"> <li>- a requirement for all suppliers/supplier's agents to report issues correctly to avoid unnecessary visits</li> </ul>	<p>It was suggested that if a meter has been fitted then there is no incentive to report category C incidents. It was suggested that consideration should be given as to how to encourage the</p>

	<ul style="list-style-type: none"> <li>- a requirement to report all category 'C' defects</li> <li>- a requirement for suppliers /supplier agents to communicate appropriately with consumers with regards to DNO's equipment.</li> <li>- a requirement for any SLA to reflect potential post installation call outs where installation of the smart metering equipment has resulted in unforeseen problems that need DNO action.</li> <li>- a requirement to consider extension and exemption codes to ensure accurate reporting</li> </ul> <p>A detailed review of all issues, associated resource and cost implications is currently being undertaken internally. This will feed in to our ED1 submission to Ofgem. During this process we plan to engage with suppliers to understand opportunities to coordinate work and minimise cost and disruption to DNOs, Suppliers and ultimately customers</p>	<p>reporting of Category C incidents.</p> <p>It was highlighted that the installation of the smart meter may result in the need for the DNO to visit the site. There will be a lot of new MOPs which may increase the risk of this occurring. The group recognised that there is a need for a standing group to share learning and information.</p>
UKPN	<p>In consideration for distributors accepting service levels on remedying defects, service levels should be placed on suppliers specifying the timeliness within which they or their agents should report Cat B and Cat C jobs e.g. within 10 working days of the site visit.</p> <p>We also believe that distributors should be able to charge abortive visit fees for any faults that are reported as a higher category than is actually the case.</p> <p>We believe these are within the scope of this DCP.</p>	<p>The Working Group noted the comment regarding sending a flow within 10WDs and agreed that this was the normal industry standard.</p> <p>The group noted that charging for abortive jobs had been included in a recent Ofgem document published on 28 September 2012, which is available <a href="#">here</a>.</p>
Western Power	No	Noted