

DCUSA Change Proposal Form

This form is issued in accordance with Clause 10.5 of the DCUSA.

Completed forms should be returned to dcusa@electralink.co.uk for assessment by the DCUSA Panel. Failure to complete all parts of the form may result in it being rejected by the DCUSA Panel.

PART A – Mandatory for all Change Proposals

PART B – Mandatory for Non Charging Methodologies Proposals

PART C – Mandatory for Charging Methodologies Proposals

PART D – Guidance Notes

PART A - MANDATORY FOR ALL CHANGE PROPOSALS

Document Control	
CP Status	Standard
CP Number	
Date of submission	
Attachments	
Originator Details	
Company Name	British Gas
Originator Name	Kevin Woollard
Category	Supplier
Email Address	Kevin.woollard@centrica.co.uk
Phone Number	07979 563580
Change Proposal Details	
CP Title	Gas First Smart Meter Installation
Impacted parties	Suppliers, DNOs, IDNOs, Generators
Impacted Clause(s)	Various
Part 1 / Part 2 Matter	Part 1
Related Change Proposals	none
Change Proposal Intent	
<p>The intent of this change is to amend the DCUSA to cater for the commercial impacts of the installation of smart meters for a gas supply in advance of the fitting of an Electricity supply Smart Meter at a given premises. At the time of the installation of the gas meter, a communications hub will also be fitted which is powered by the electricity supply. In order to fit this device, the electricity supply must be de-energised/re-energised. An on-going need to de-energise/re-energise the electricity supply may also be required for maintenance or replacement of this device.</p> <p>It is not intended that permission for first energisation of an electricity supply is given where a smart gas meter and associated communications device are fitted first but no electricity meter has been installed.</p>	
Business Justification and Market Benefits	
<p>At the time of the installation of the Gas Meter, a communications hub will also need to be fitted which is powered by the electricity supply. In order to fit this device, the electricity supply must be de-energised, electrical work must be carried out safely and in compliance with other industry codes and with legislation and the electricity supply must then be re-energised and re-sealed.</p> <p>Under the current industry baseline, the de-energisation and re-energisation of the electricity supply is under the control of the registered Electricity Supplier, which may be a different party to the Gas</p>	

Supplier for whom this work is being undertaken in a Gas First scenario.

Proposed Solution and Draft Legal Text

The identified solution is to facilitate the accession to DCUSA of any Gas Supplier that wishes to fit a Gas smart meter in advance of the electricity meter (except at new premises where there is no electricity meter), ensure that those suppliers use Gas Meter Operators who are party to MOCOPA® and to ensure that the commercial relationships between the Gas Supplier, Electricity Supplier and the Distributor are defined.

Draft legal text is given in an attachment.

Proposed Implementation Date

1st October DCUSA release

Impact on Other Codes

Please tick the relevant boxes and provide any supporting information.

BSC	<input type="checkbox"/>
CUSC	<input type="checkbox"/>
Grid Code	<input type="checkbox"/>
MRA	<input type="checkbox"/>
Other	<input checked="" type="checkbox"/>
None	<input type="checkbox"/>

The current wording of MOCOPA only allows the appointed meter operator to break and reseal seals on metering and distribution equipment. A change will be raised to the MOCOPA agreement in parallel to this DCUSA change.

Consideration of Wider Industry Impacts

This has been proposed as a result of discussions in the Working group 4 of the Smart Metering Implementation Programme.

This change has also been discussed by the DCUSA Smart Working Implementation Group and initial legal drafting has also been provided by that group.

Environmental Impact

No direct impact.

Confidentiality

None

PART B – MANDATORY FOR NON CHARGING METHODOLOGIES CHANGE PROPOSALS

DCUSA Objectives

General Objectives:

Please tick the relevant boxes.

- ☐ 1 The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks
- ☐ 2 The facilitation of effective competition in the generation and supply of electricity and (so far as is consistent therewith) the promotion of such competition in the sale, distribution and purchase of electricity
- ☒ 3 The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences
- ☐ 4 The promotion of efficiency in the implementation and administration of this Agreement
- ☐ 5 Compliance with the Regulation on Cross-Border Exchange in Electricity and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.

Rationale for better facilitation of the DCUSA Objectives identified above

Standard License Condition 4 of the Distribution License states

Condition 4. No abuse of the licensee's special position

General obligation

4.1 The licensee must at all times manage and operate the Distribution Business in a way that is calculated to ensure that it does not restrict, prevent, or distort competition in the supply of electricity or gas, the shipping of gas, the generation of electricity, or participation in the operation of an Interconnector.

In order to facilitate competition in gas, suppliers must be able to install gas smart meters independently of the electricity supplier where different suppliers provide gas and electricity supplies to a property.

Electricity distribution companies have a general obligation not to restrict, prevent or distort competition in the supply of electricity or gas. This change will assist them in meeting this general obligation.

PART C – MANDATORY FOR CHARGING METHODOLOGIES PROPOSALS

DCUSA CDCM Objectives

Please tick the relevant boxes.

CDCM Objectives:

- ☐ 1 that compliance by each DNO Party with the Charging Methodologies facilitates the discharge by the DNO Party of the obligations imposed on it under the Act and by its Distribution Licence
- ☐ 2 that compliance by each DNO Party with the Charging Methodologies facilitates competition in the generation and supply of electricity and will not restrict, distort, or prevent competition in the transmission or distribution of electricity or in participation in the operation of an Interconnector (as defined in the Distribution Licences)
- ☐ 3 that compliance by each DNO Party with the Charging Methodologies results in charges which, so far as is reasonably practicable after taking account of implementation costs, reflect the costs incurred, or reasonably expected to be incurred, by the DNO Party in its Distribution Business
- ☐ 4 that, so far as is consistent with Clauses 3.2.1 to 3.2.3, the Charging Methodologies, so far as is reasonably practicable, properly take account of developments in each DNO Party's Distribution Business
- ☐ 5 that compliance by each DNO Party with the Charging Methodologies facilitates compliance with the Regulation on Cross-Border Exchange in Electricity and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.

General Objectives:

- ☐ 1 The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks
- ☐ 2 The facilitation of effective competition in the generation and supply of electricity and (so far as is consistent therewith) the promotion of such competition in the sale, distribution and purchase of electricity
- ☒ 3 The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences
- ☐ 4 The promotion of efficiency in the implementation and administration of this Agreement
- ☐ 5 Compliance with the Regulation on Cross-Border Exchange in Electricity and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.

Rationale for better facilitation of the DCUSA Objectives identified above

CDCM Objectives:

General Objectives:

Standard License Condition 4 of the Distribution License states

Condition 4. No abuse of the licensee's special position
General obligation

4.1 The licensee must at all times manage and operate the Distribution Business in a way that is calculated to ensure that it does not restrict, prevent, or distort competition in the supply of electricity or gas, the shipping of gas, the generation of electricity, or participation in the operation of an Interconnector.

In order to facilitate competition in gas, suppliers must be able to install gas smart meters independently of the electricity supplier where different suppliers provide gas and electricity supplies to a property.

Electricity distribution companies have a general obligation not to restrict, prevent or distort competition in the supply of electricity or gas. This change will assist them in meeting this general obligation.

Has this issue been discussed at any other industry forums? If so please specify and provide supporting documentation

SMRG WG4

Attached WS4 identified issues log spreadsheet

PART D – GUIDANCE NOTES FOR COMPLETING THE FORM

Data Field	Guidance
Attachments	Append any proposed legal text or supporting documentation in order to better support / explain the CP.
Change Proposal Intent	Outline the issue the CP is seeking to address. Please note that the intent of the CP cannot be altered once submitted.
Confidentiality	Clearly indicate if any parts of this Change Proposal Form are to remain confidential to DCUSA Panel (and any subsequent DCUSA Working Group) and Ofgem
CP Status	A CP may be deemed 'urgent' in accordance with Clause 10.4.8 of the DCUSA. The proposer should give supporting reasons.
DCUSA General Objectives	Indicate which of the DCUSA Objectives will be better facilitated by the Change Proposal.
DCUSA CDCM Objectives	Indicate which of the DCUSA CDCM Objectives will be better facilitated by the Change Proposal. Please note that a CDCM change may also facilitate the DCUSA General objectives.
Draft Legal Text	Insert proposed legal drafting (change marked against any existing DCUSA drafting). The Change Proposal Intent will take precedence in the event of any inconsistency.
Environmental Impact	Indicate whether it is likely that there would be a material impact on greenhouse gas emissions as a result of the proposed variation being made. Please see Ofgem Guidance .
Impact of Wider Industry Change	Indicate whether this Change Proposal will be impacted by or have an impact upon wider industry developments. If an impact is

	identified, explain why the benefit of the Change Proposal may outweigh the potential impact and indicate the likely duration of the Change.
Part 1 / Part 2 Matter	A CP must be categorised as a Part 1 or Part 2 matter in accordance with Clause 10.4.7 of the DCUSA. All Part 1 matters require Authority Consent.
Proposed Implementation Date	The Change can be implemented in February, June, and November of each year.
Proposed Solution	Outline the proposed solution for addressing the stated intent of the CP. The Change Proposal Intent will take precedence in the event of any inconsistency. A DCUSA Working Group may develop alternative solutions.
Rationale for DCUSA Objectives	Provide supporting reasons and information (including any initial analysis that supports your views) to demonstrate why the CP will better facilitate each of the DCUSA Objectives identified.
Related Change Proposals	Indicate if the CP is related to or impacts any CP already in the DCUSA or other industry change process.