

**DCUSA DCP 127 Request for Information (RFI) Responses – Collated Comments**

NOTE: The Working Group's responses should be read in conjunction with the minutes of its meeting on 16 August 2012, in particular the appendix relating to points for the legal text and the guidance note. The minutes and other DCP 127 related documents are available on the DCUSA Website ([www.dcusa.co.uk](http://www.dcusa.co.uk)).

<b>Respondents</b>
Health and Safety Executive (HSE)
Inexus Services Ltd
Western Power Distribution
UK Power Networks
IMServ
Northern Power Grid
National Grid Gas Distribution
SSE Metering
SSE Distribution
Electricity North West
SP Manweb / SP Distribution
British Gas
Npower
ScottishPower Energy Retail Ltd
SSE Energy Supply

Question One	What reporting do you require and why, when gas comms hubs are installed?	Working Group's Comments
Health and Safety Executive (HSE)	n/a	
Inexus Services Ltd	Electricity DNO – that work on the Network has been completed by a competent organisation with authority to work on the distribution system Gas DNO – that the work has been carried out by a competent organisation with a valid Warrant to Set & Seal the meter regulator	Covered by MOCOPA and MAMCoP (gas).  Add to guidance note that legal arrangements backing up the guidance is the DCUSA.
Western Power Distribution	We require UMS inventory data in respect of gas communications hubs to enable us to recover DUoS income for consumption by those hubs. We do not believe the working group can simply decide not to address the issue of additional network losses that will arise from this proposal in the absence of suitable UMS arrangements being made. We also require defective/unsafe DNO equipment identified by the installer to be reported in an agreed standard format, ideally in line with the new reporting codes being introduced for use in the electricity market. We note that the guidance note mentions the need for the installer to report	Unmetered point had been flagged to Ofgem.  The WG recognised that the customer may be unhappy if the job was not done, but noted there will be various instances of these for smart installations, e.g. no WAN signal.  A stronger argument for reporting was that the smart electricity meter installation could also fail.  It was unclear if the benefit of reporting failed installations would be worth the resource required to identify the electricity supplier and take follow up action. It could

	<p>issues but it is silent as to how this should be done.</p>	<p>also cause confusion for the electricity supplier receiving unexpected information.</p> <p>Reporting conclusion:  <b>Cat A (unsafe)</b> report by phone  <b>Cat B (not unsafe, but prevents gas first install)</b> report by email to electricity supplier, or if the gas fitter is also an electricity meter operator it may be able to send a flow to the electricity supplier.</p>
<p>UK Power Networks</p>	<p>A technical dataflow corresponding to each installation or change of comms hub, whether gas or electricity in respect of the physically metered exit point such that;</p> <ol style="list-style-type: none"> <li>1. an unmetered electricity consumption may be determined or inventory of items validated,</li> <li>2. reports of black box type devices to RPU can be cross checked to determine if they are hub power units.</li> </ol>	<p>The WG considered information on installations, so that losses/UMS consumption can be accounted, would be a future activity when those provisions are agreed. It was viewed as better not to preempt what UMS arrangements might look like and what reporting might be needed.</p> <p>The WG noted that many HH meters are currently in the same situation and not being reported on or accounted for within losses calculations. The many installations outside of gas first (e.g. AMR, electricity and gas second comms hubs) that will be much more significant in terms of energy than gas first.</p> <p>It was noted that RPU call centre staff could be trained to recognise the comms hub so it</p>

		<p>was not identified as a suspicious device.</p>
<p>IMServ</p>	<p>We have considered the question of reporting and its frequency and in doing so have considered its actual use and value. Whilst we had initially favoured the need for timely and frequent reporting as, this could be referenced if a fault is reported and as such would indicate the potential source of the problem, on further consideration we realise that this would not change our approach or indeed the resolution method. We would manage these faults and issues in the same way as we manage any other where there is no gas smart meter. That being the case, we do not require reporting for BAU purposes.</p> <p>We do however believe there is a need for reporting in order to perform trend analysis and there are two reasons for this: -</p> <p>1) Feedback – Whilst we appreciate that the installer will be MOCOPA trained, there is no mechanism within this entire process for determining it’s on-going success, quality, impact or issues. A MOCOPA audit is an annual event and the feedback process is extended therefore this does not provide adequate independent assurance of the general robustness of the process. Reporting</p>	<p>The WG did not anticipate any issues with MOCOPA audits due to gas first.</p> <p>The WG didn’t consider interruption to supply would affect SLAs as is similar to mains failure. It would need to be clear who was responsible for the work but knowing who else has done site work wouldn’t necessarily allow you to identify responsibility for a fault.</p>

	<p>to a Meter Operator would allow the MOP to perform a comparison against subsequent faults/issues raised and provide feedback to DCUSA on the findings.</p> <p>2) Combined DC/MOP services – a common service offering in the current market, and future smart market is combined Data Collection/Meter Provision/Energy Management and in many instances commercial arrangements will carry SLAs and will be modelled on a typical number of faults per year. If data collection is impacted due to the actions of a gas installer, this fact becomes critical due to the consequences of the issue. As a MOP, we therefore require a record of meters to which we are the appointed electricity MOP at which work has been performed by a gas fitter. In order to support both these requirements we propose that MOPS receive bespoke versions of the same reports generated for Suppliers however this should also include the MPAN detail.</p>	
Northern Power Grid	Northern Powergrid will require a programme of planned installations (including the planned date of installation), this information will be required to allow Northern Powergrid to complete audits on operatives to ensure isolation and installation	The WG was of the opinion that this kind of auditing on MOAs should be internal standard practice and MOCOPA rather than in the DCUSA, which did not contain an equivalent for electricity meter operators.

			<p>is to the required standard.</p> <p>Northern Powergrid will also need to know where, and by whom, a Hub has been fitted. This information is required to enable quality inspection to be carried out on installed assets.</p>	
National Distribution	Grid	Gas	No comments	
SSE Metering			<p>Due to the ongoing liability that we could incur from this at customer churn, we would need to know the locations when we gain a customer. The responsibilities need to be clear around ownership and who has a liability to perform what. For example, what is the MAP/MAM responsible for? It is not entirely clear from the guidance notes what happens in these circumstances.</p>	<p>The WG considered this was covered in the guidance note where it is stated that the gas MAM retains responsibility for the gas comms hub.</p>
SSE Distribution			<p>Scottish and Southern Energy Power Distribution needs to know the location of each installed gas first communications hub by MPAN location and the power consumption of each comms hub. This information is required to reconcile “system losses” or prepare unmetered billing charging statements for energy consumed by this equipment.</p> <p>We note the content of section 7 of the guidance notes regarding power</p>	<p>See previous responses on losses and revenue protection call centre training.</p>

	<p>consumption. However we are concerned that this issue has not been sufficiently investigated to determine how power consumption associated with the supply of gas only can (or indeed should) be attributed to system losses and therefore borne by the general mass of electricity consumers. Information regarding the specific location of these devices may also be required to assist with fault management procedures/ processes and to answer customer enquiries.</p>	
<p>Electricity North West</p>	<p>We believe there are a number of reporting requirements that are required:                  Losses – we still do not know what the solution will be in dealing with the losses on the network that such installations will have be it via an unmetered inventory or adjusted reporting. Either way we will need to know the MPAN, site address, date of installation, wattage of the communications hub, installer and Gas supplier name and contact details. If the MPAN cannot be obtained from the customer, this should be replaced with the electricity meter serial number.                  On site ownership – we need to be able to understand ownership of the seals should there be any cause of damage to our equipment. Is this catered for and addressed by MOCOPA®? Dependent upon the answer,</p>	<p>The WG noted that seal ownership is covered by MOCOPA. There is a list of codes on the MOCOPA website.</p>

	the above response to losses may be amended.	
SP Manweb / SP Distribution	The DNO needs to have this information in order to gather data on where supply de-energisation takes place for the gas first installation without the need for its intervention. This will help it with resource planning for the electricity smart meter roll out.	<p>The WG could see the benefit, but wasn't sure how "average" these installations would be and therefore could be of limited value.</p> <p>The WG noted issues found at time of gas installation might be different from when the electricity installation is performed.</p> <p>The WG noted the DNOs could request this information from gas or electricity suppliers or meter operators.</p>
British Gas	We do not see any specific requirement for reporting on gas communications hubs as part of DCP 127. However we note that under UNC modification 430 it is proposed that gas suppliers will be required to record the type of smart gas smart meter installed.	Noted
Npower	We believe that it is important, particularly during the early stages of foundation and roll-out, that gas first installations are carefully controlled and monitored to ensure that the smart roll-out and the various industry party roll-out strategies are not adversely impacted. We therefore support the concept of reporting that will effectively	<p>It was clarified that this information goes to the gas operative, but the method of reporting was not known.</p> <p>It was useful to understand what work had been done prior to installing the smart electricity meter.</p>

	<p>provide an appropriate level of communication between what is essentially the first and second installer as to the status of the meter point site both before and after the first installation. The report could include, but not be limited to, the following:</p> <p>Date of installation          Installing Agent Id;          Code to cover work involved e.g.:</p> <ul style="list-style-type: none"> <li>1 - standard communications hub installation;</li> <li>2 - work on tails required</li> <li>3 - meter removal required as part of installation;</li> <li>4 - meter re-sight required</li> <li>5 - Any faults identified by gas installer will be reported back</li> </ul>	<p>The WG considered the definitions proposed by Npower could be tighter, e.g. what tails work has been done.</p> <p>The WG noted meter removal shouldn't happen on gas first visits, the job should be aborted unless the meter would be directly re-installed in the same place.</p> <p>It was recognised that there could be exceptional circumstances e.g. the gas operative damages the electricity meter and needs to remove/replace. In that scenario the gas operative or supplier could advise the electricity supplier immediately, or do the remedial work and report it afterwards. It was noted there are existing processes in the electricity arrangements for the meter operator to manage emergency change of metering equipment by another party (e.g. DNO).</p> <p>WG supplier members' gave their views on whether electricity suppliers would want to receive the suggested codes:          No. 2 (tails) no          no. 4 (meter re-site) yes as could cause confusion if obvious has been moved.          No. 5 (faults) yes, on any such issues,</p>
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			<p>including meter, category A and B.</p> <p>It was agreed to capture these points in the legal text and the guidance note.</p>
ScottishPower Retail Ltd	Energy	<p>We think the electricity supplier should be provided with a report that identifies where such equipment has been added to its installation, as well as the type installed. This will allow the electricity supplier to determine whether it is able to use this comms hub for its electricity SMS comms requirements. The report should also include meter readings before de-energisation and after re-energisation. This is to ensure no consumption data is lost if the meter resets etc. The report should be in an agreed format with contact lists set up on the SPAA website. The format should form part of the guidance document.</p> <p>The customer's electricity supplier should be kept informed whenever a relevant supply interruption is sustained, as such interruption could represent a material loss of revenue and impact on settlement accuracy. For this reason, we would prefer that the gas supplier's representative record and maintain a record of the length of each interruption. A</p>	<p><b>Identification of equip:</b></p> <p>The WG noted installations prior to SMETS2 wouldn't specify the type of hub installed. But noted it was a useful point: that electricity supplier should know if it can use the gas comms hub.</p> <p>It was noted that comms hubs might need to be changed at DCC adoption.</p> <p>The WG noted that meter readings would demonstrate no consumption data had been lost during installation.</p> <p>The WG concluded that the electricity supplier wouldn't need to know what was on site re technical attributes as its operatives would likely be carrying enough variety of equipment to manage what was on site and be able to install all required electricity smart metering equipment.</p> <p><b>De/re energisation reads:</b></p>

	<p><i>de minimis</i> threshold could be established to determine materiality, above which the gas supplier could be required to report such instances, perhaps to the Authority. We would also recommend that, if such a reporting line was established, a random sample audit regime should follow. As a general point of note (SMETS1 requirements notwithstanding) we think that some cognisance must be taken of the impending introduction of SMETS2 and the need to satisfy any relevant DCC adoption criteria. In essence, we need to be mindful that the lack of robust controls around such installations in the short term would invite cost escalation and risks undermining consumer engagement when the mass roll out gets underway.</p>	<p>The WG noted it was standard/good practice for reads to be taken on all instances of de/re energisation. It was considered that might take some effort to do, but it would only need to be reported after the job if there was an issue caused during installation that affected the elec meter reads e.g. damage or reset. A majority of the WG agreed to put a note in the guidance note</p> <p><b>Power Outage:</b></p> <p>It was observed that (longer/planned) power outages occur for other reasons that aren't reported.</p> <p>The WG noted electricity suppliers and meter operators' commercial relationships may account for loss of revenue during long outages. However, the majority of WG felt that instances of significant disruption and cost to electricity supplier / customer would not be high enough to not to justify such reporting, especially with the point above re reporting exceptional circumstances.</p>
SSE Energy Supply	The Electricity Supplier will need to be aware of whether a "gas first" communications hub	Reporting to electricity suppliers had already been covered.

	<p>is installed. Electricity Suppliers will need to instruct their Meter Operator when installing a smart electricity meter or replace the existing meter that the electrical installation includes a communications hub. This would ensure that Meter Operators can provide appropriate installation instructions to their operatives for such sites.</p> <p>Additionally, a potential gaining Gas Supplier would need to be aware of the “gas first” communications hub at Change of Supplier. However, complications could arise if the incoming Supplier is not a DCUSA signatory (one who chooses not to install “gas first”) or the Gas MAM of the incoming Supplier is not MOCOPA registered, then it would not be possible to manage the part of the installation connected to the electricity supply therefore the responsibility in these situations is unclear.</p> <p>We believe that a gas first solution that requires a hardwired Communications Hub is only possible when SMET2 equipment is available but should not be considered before this point. A battery powered GPRS device would seem to be the best solution in the interim as this does not cause confusion. We feel there is far more benefit for the consumer in a smart electricity meter/IHD</p>	<p>Gas supplier reporting would require reference in Xoserve’s Data Enquiry Service (DES).</p> <p>It was noted that most gas suppliers would need to accede to the DCUSA for gas first; the Supply Point Administration Agreement (SPAA) would be the route for informing gas suppliers of their obligations.</p> <p>The WG reiterated its previous view that battery power would not be sufficient for these types of devices.</p>
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	set-up than gas as the customer would be provided with instantaneous energy consumption information to help manage usage better.	
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Question Two	Please give feedback on the guidance note (Attachment 2).	Working Group's Comments
Health and Safety Executive (HSE)	<p>Those installing gas 1st comms hubs will be dual fuel operatives and when installing the communications hub they would need to work safely as if they were installing an electricity meter and all agreed processes should be adhered to. This should include reporting safety implications/ defects to the relevant person, e.g. network defects to DNO's using the safety action categories. If for whatever reason the gas 1st comms hub becomes redundant (e.g. if the gas meter is linked to the electricity hub) it would be sensible to remove the redundant equipment because if it remains on the system the supplier would need to ensure it remains safe.</p>	<p>The WG considered this point was covered under legal text. However, the guidance note could have an state it had been written to accompany legal requirements in the DCSUA and those obligations take precedence, including safe working, reporting safety issues, damage and irregularities.</p>
Inexus Services Ltd	<p>There is no mention of the customer being advised that their gas supply will be interrupted during the period of the exchange (it is acknowledged that this is obvious but should be included for completeness)</p> <p>It is understood that the power consumption (2W) is for the entire system – can it be confirmed that this is the case – if not, what is the expected maximum final value (2W per unit – gas “module” &amp; electricity “module”)?</p>	<p>The WG's view was that DSEAR was relevant to the gas meter rather than the comms hub.</p> <p>The WG noted the Association of Meter Operators (AMO) had been working on asset returns and a consultation is currently out.</p>

	<p>No mention made of advisory / warning labels to be fitted to either gas/electricity installation (does the provision of the external equipment make the gas domestic installation subject to DSEAR? – this has an impact on the labels)</p> <p>Where a Non-SMETS2 gas meter is to be replaced with SMETS2 compliant equipment is it expected that the redundant hub with physically be removed or that it is only to be isolated? If removed, is there a proposal for a formal process to allow the “owner” to recover his asset(s)?</p>	
<p>Western Power Distribution</p>	<ol style="list-style-type: none"> <li>1. Add a section to state the qualification/competency requirements for the operative carrying out the installation.</li> <li>2. Expand bullet point 8 in part 3 installation process to explain how defects on DNO equipment are reported.</li> <li>3. Second bullet point on page 4 states that in some cases customer tails may have to be extended. If this is the case we would expect visit to be aborted unless either: <ul style="list-style-type: none"> <li>• the installer is a qualified electrician (part P registered) and therefore allowed to extend the tails or</li> <li>• the installer fits an isolator between existing customer tails and the meter.</li> </ul> </li> <li>4. Add a section to provide details of how a</li> </ol>	<ol style="list-style-type: none"> <li>1 The WG agreed this could go into the guidance note</li> <li>2 Already covered in DCUSA</li> <li>3 Should follow normal MOA practices</li> <li>4 UMS discussion covered earlier</li> <li>5 The WG considered it could be useful if equipment was labelled as SMETS1 / 2 compliant and took an action to feed that view into the DECC report.</li> </ol>

	<p>gas hub installation is added to UMS inventory.</p> <p>5. In scenarios for subsequent installation of electricity meter, it is not clear how the electricity meter operator arriving on site, or the electricity supplier requesting the installation of the smart electricity meter, will know whether the existing gas communications device is smets1 or smets2 compliant. Please expand the guidance to indicate how they should do this.</p>	
UK Power Networks	<p>Section 6. It is not clear by what means information systems within the gas industry or the electricity industry would be updated with changes in ownership or responsibility for comms hubs or changes in details of the comms hubs so that is visible to the other licenced industry, i.e. how would a gas meter operator changing or renewing a comms hub determine the relevant electricity supplier and update the electricity supplier of the changed responsibility if they do not have access to electricity industry dataflows.</p> <p>Section 7, If the change is accepted by electricity and gas suppliers as necessary, the document needs to further clarify as working guidance,</p>	<p>The WG considered the issue was around what equipment is compliant with which SMETS version and labelling so that operatives install other equipment on site that is compliant/compatible.</p> <p>UMS discussion covered earlier.</p>

	<p>in support of any further DCUSA terms, who takes responsibility as ‘unmetered customer’ and for registering as ‘unmetered electricity supplier’ for the comms hubs.</p>	
<p>IMServ</p>	<p><b>Documents issued for review</b> – This should have included the actual DCUSA redlining (which we requested separately) otherwise respondents are missing a vital piece of information which provides many answers and the context to the Guidance Note. Without this, incorrect assumptions will likely be made and responses flawed.</p> <p><b>Scope</b> – The Guidance Note does not confirm or describe the scenarios/ circumstances in which it should or should not be used and nor does it reference which Code or Framework Agreement it is designed to support/compliment – this is a gap. Our interpretation of the actual DCUSA wording is that this would be applicable to both ct and w/c metering and also scenarios where there is an existing AMR meter or an AMR meter will be installed in the future. Our comments are provided based on this assumption.</p> <p><b>Training</b> – again the Guidance Note references the fact that some processes are to be performed in accordance with</p>	<p><b>Documents issued for review</b> Noted</p> <p><b>Scope</b> The Guidance Note was not designed to be exhaustive and is based on DCUSA requirements.</p> <p>The WG agreed the gas first arrangements should relate only to Whole Current (WC) metering and the legal text should clarify that. Installations on Current Transformer (CT) sites should be aborted.</p> <p><b>Training</b> Gas fitters will have standard MOCOPA membership/certification.</p>

	<p>MOCOPA requirements but does not explicitly state that the operator should be MOCOPA certified although; we do note that this is described in DCUSA itself. This comment is similar to that made regarding the scope and could be addressed by either referencing the DCUSA requirements or copying them over.</p> <p>Irrespective, we would request assurance of the statement made in DCUSA (56.2) as to whether this does in fact mean that they would be subject to the same training and annual audit requirements as existing Meter Operators or, will this be a new and perhaps slim-downed type of membership specifically for gas fitters?</p>	
<p>IMServe (ctnd)</p>	<p><b>Installation Issues:</b> As noted above, in our original response we noted an additional scenario which had not been described and queried whether this would be included in the scope, i.e. the installation of a smart gas meter at a premise at which an AMR electricity meter already exists and at which an electricity smart meter will therefore never be installed. The redlined wording in the DCUSA document implies that this scenario would be included in the scope as it is not explicitly excluded. We previously</p>	<p><b>Installation Issues:</b></p> <p>A WG member reported that advice from device manufacturers is that equipment in close proximity does not cause any technical issues.</p> <p>If any doubt on part of gas fitter re which elec meter relates to the property, the job should be aborted. Referenced in guidance note. This only covers WC, and don't believe need to split that down further.</p>

	<p>raised a specific question regarding this type of scenario and that was in relation to testing of the existing meter comms to ensure that no issues will be introduced as a result of two sets of comms being located in close proximity - there is no mention in any of the documentation as to whether this will be performed and this presents a concern to us as this accounts for the majority of instances which we will encounter this new process.</p> <p>We recognise the effort and thought involved in producing the checklist and suggest this would be further enhanced, and therefore more beneficial, if this was separated into specific check lists for use in single w/c, 3 phase w/c and lastly ct metering as, specific checks are required in each of these instances.</p> <p>Also, as a company with experience in installations at micro-domestic premises we are well aware of the issues which can arise when the meters are powered back up, despite having provided advice to the customer beforehand. This being the case, we would ask what the process is for both managing this situation at a) the point in time it arises and also b) any subsequent claims</p>	<p>The WG was unclear if micro-domestic meant micro-generation. It considered switching off of micro-gen equipment was worth covering in the guidance note – it should be as per standard MOA practice.</p> <p>All equipment on site should be labelled so gas operative was aware of import/export meters. The WG did not envisage any technical issues with de-energising import metering for gas first installations where there was also export metering.</p> <p>The WG considered damage would be covered by standard negligence law and/or supply contract, as per other industry governance documents.</p> <p><b>Enforcement</b></p> <p>The WG confirmed it was not intending the guidance note to constitute a formal process. Even if was governed under DCUSA, disputes would be dealt with bilaterally in most cases of breach.</p>
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	<p>regarding damage to customer equipment and property. We would advocate that both these elements should be described in the Guidance Note to confirm where responsibilities lie.</p> <p>The Guidance Note advises that the Gas Fitter should “approach the customer and identify the relevant, associated electricity meter, but we would ask what this is based upon? Will the Gas Fitter have been provided in advance with details of the electricity meter that he should encounter in order that he can validate that he is attaching to hub to the correct point? Again from experience, as is also possibly the case when installing gas meters, there are frequent occasions of unexpected meter “finds”, inconsistent records and sometimes crossed meters. What information will the gas fitter use to validate that the electricity meter is the one which he expected to locate and what is the process if this differs? If this first vital check is not confirmed at this point in the process, all processes and data collected after this point is potentially flawed.</p> <p><b>Enforcement</b> – it is not clear from the documentation as to how the Guidance Note</p>	
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	<p>will be enforced or what the process is for escalating any issues/concerns that arise if it is found that the Guidance Note is not being followed. MOPS and MAPS need to have a formal process to follow to in such situations and the existence of such would provide some assurance in what is still a process which presents serious concerns.</p>	
<p>Northern Power Grid</p>	<p>The installation process is silent on the competence of the person installing the asset. Until a common national competency arrangement is agreed and signed off Northern Powergrid will insist that all operatives who are required to remove a service fuse satisfy an assessment at one of our training schools.</p> <p>Section 2 of the guidance note proposes protection to electricity Meter Operators in the form of the following bullet point "not impair the electricity meter operator in maintaining their meter". Similar safeguards should also be introduced for Distribution Network Operators ie " not impair the electricity distribution network operator in maintaining their service equipment".</p> <p>The guidance note would benefit from the</p>	<p>Competence is covered by MOCOPA.</p> <p>The WG agreed there should be no impairment to electricity network operators and agreed to add a reference in the guidance note.</p> <p>The WG noted it could be useful to have a reciprocal arrangement for electricity suppliers to inform gas suppliers of any faults/damage of gas equipment. However, failure or removal of the gas comms hub would trigger a comms failure that would get investigated.</p> <p>There are similar clauses referencing the licence condition on revenue protection reporting requirement, which requires DNOs to inform the "authorised" supplier of damage/interference that affects meter</p>

			inclusion of a section dealing with responsibilities and ownership of Gas 1st hubs once installed as well as providing guidance on defect/fault rectification of a gas 1st hub once commissioned.	registers (comms hubs wouldn't be covered).  The WG concluded the guidance note does not have to cover every scenario and this would be an exceptional circumstance.
National Distribution	Grid	Gas	No comments	
SSE Metering			<p>Overall we feel that the guidelines themselves are not strong enough and it requires a set of rules in place to provide the governance required for the following reasons:</p> <p>We need to be mindful of the unmetered load that is drawn from these devices and the impact on the network. Some properties could have two hubs installed with the costs expected to be socialised. Is this fair to burden customers with the cost of two devices when we should be working towards interoperability.</p> <p>Is there quantified research into the energy consumption of these devices relative to the point above?</p> <p>We already know that the space available for electric smart meters may be an issue due to the increased size of these assets. These comms hubs should be installed in such a</p>	<p>UMS discussion was covered earlier.</p> <p>The WG agreed the guidance note should suggest installers make reasonable endeavours not to affect other equipment on site.</p> <p>It was noted that the current electricity arrangements give suppliers' agents responsibility for reporting damage. The WG considered gas operatives should not be inspecting electricity equipment.</p> <p>The WG agreed to add fuses to the guidance note, as an example of generic protection mechanisms.</p> <p>Revenue protection discussed earlier.</p> <p>The WG felt the customer journey was for</p>

	<p>way as not to prevent an electric smart meter from being installed at a later date.</p> <p>What are the ongoing operational and maintenance cost where suppliers gain these through churn. We already have a regime in place for gas meter inspections so does this form part of that inspection regime? If so how would these be identified at routine inspections particularly as they are often sited at remote locations from the gas meter?</p> <p>The document refers to protection in the form of 100A cut out fuse but this is only relevant to the tails and meter themselves and not the associated equipment with the comms hub. I would expect to see an internal/integrated fuse to provide protection to the installation in the event of fault. If we rely wholly on the 100A fuse then we will not meet the ESQCR's.</p> <p>There is no mention of managing revenue protection issues or meter faults that have been identified on site and will need to be reported to the responsible MOP.</p> <p>How are these to be managed when redundant and removed from site? There will need to be a returns process that</p>	<p>Suppliers to manage as part of the installation process.</p> <p>The WG considered shared use of comms and commercial arrangements was outside the scope of the guidance note.</p>
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	<p>demonstrates responsible disposal of these items when not fit for purpose or faulty and at least returned to owner.</p> <p>Has the customer journey been fully considered should both fuels be installed in a short space of time. The electricity supply will need to be disturbed twice to allow both installations to go ahead. We should be mindful of keeping customers engaged throughout the programme and managing reasonable expectations. A clear instruction would be needed for the customer around the impacts of going off electricity supply for both installations along with the reduction of functionality of the meter if they churn.</p> <p>Regarding shared use of the communication device and the commercial arrangements that could be secured, further detail would be required around this before it can be agreed to as there are clearly data security issues pre DCC.</p>	
SSE Distribution	The guidance document has not been developed sufficiently to become a governance document (see question 3) as will be required if gas first comms hubs are to become a permitted solution.	<p>Noted</p> <p>The WG agreed to enquire with the SPAA CP proposer whether responsibility for ongoing maintenance of the device will pass between gas suppliers and their agents when a</p>

	<p>There are a number of issues that require further explanation/development, specifically relating to:</p> <p><u>Operation, Inspection, Maintenance and Safety of the Device</u></p> <p>It has been assumed that responsibility for ongoing maintenance of the device will pass between gas suppliers and their agents when a customer changes supplier. In order for this to happen there needs to be agreement amongst suppliers and appropriate governance in place to ensure this happens on every occasion. Unless there are agreed defined industry rules and processes relating to this issue it is possible that an incoming supplier may not be aware what their future ongoing responsibility will be or they may choose to ignore any guidance relating to comms hub operation which will effectively leave a device connected to our equipment/network without a responsible operator. This situation would be a clear breach of ESQCR.</p> <p>Additionally it is possible that a supplier will take on a supply point where a gas first comms hub has been installed yet not hold the necessary electrical accreditation, again possibly leaving the device without an</p>	<p>customer changes supplier. Also, whether gas suppliers could take on a supply point where a gas first comms hub has been installed, but not hold the necessary electrical accreditation, leaving the device without an operator. The WG did not consider transfer between gas suppliers on change of supplier was in the remit of the DCUSA.</p> <p>The ESQCR issue has been raised with DECC and Ofgem.</p> <p>The WG considered that the guidance note should not consider safety matters – standard H&amp;S legislation and industry rules were sufficient.</p> <p>The WG considered ongoing responsibility for the gas comms hub was a gas arrangement issue, not for the DCUSA.</p> <p>The WG noted the points around follow up electricity meter installation, but considered issues such as space constraints were for the</p>
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	<p>operator.</p> <p>In order for gas suppliers to know what equipment they will be responsible for it is essential that information relating to gas first comms hubs is transferred between suppliers during the change of supplier processes.</p> <p>Rules regarding responsibility for the routine inspection of gas first comms hubs are required. The gas MAM will need to inspect the gas first comms hub as part of its inspection of the gas meter, as this equipment will nearly always be at a remote location there is a significant risk that inspection will not occur. The inspection will need to be carried out by an individual with a degree of electrical knowledge in order to ensure that all associated defects/risks are identified.</p> <p>It is of paramount importance that electrical safety has the highest priority, both in the initial installation and the ongoing deployment until such time as the device is removed, particularly but not exclusively with regard to the occupants of the premises in which the devices will be installed. A lightweight and underdeveloped structure of “guidance notes” and “recommended practices”, potentially with little or no</p>	<p>wider smart roll out rather than for gas first.</p> <p>The WG noted that DCP 127 already specifies redundant hubs should be removed.</p> <p>Protection mechanisms will be covered in the guidance note</p> <p>The UMS issue had already been discussed.</p> <p>The use of batteries had already been discussed.</p> <p>The WG did not consider the guidance note should account for commercial impact.</p> <p>Existing provisions for similar damage to network operator equipment are already in place. The WG did not consider special arrangements for gas first were required.</p>
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	<p>ongoing governance, is wholly inadequate to ensure that public safety is given the necessary level of priority in all phases of the deployment of these devices. Robust and mandatory rules are essential to ensure that all safety-related matters are subject to appropriate levels of diligence.</p> <p><u>Ongoing Liability</u></p> <p>In a similar way to operation and maintenance the ongoing liability for the device must be clearly defined within appropriate industry rules and governance.</p> <p><u>Follow up Electricity Meter Installation</u></p> <p>Given that the proposed electricity smart meter will be significantly larger than existing dumb meters it is possible that the installation of a gas first comms hub will hinder the future installation of the electricity smart meter due to space constraints at the service position. Suppliers need to agree how such issues will be managed in order to prevent network operators becoming involved in such situations.</p> <p>Consideration also needs to be given regarding how the connection of stand alone electricity comms hubs will be facilitated</p>	
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	<p>when a gas first comms hub has previously been installed. There is a general assumption that all electricity comms hubs will be integral to the electricity smart meter but, whilst this is one solution, there may be situations where stand alone electricity comms hubs will be required.</p> <p>Again robust governance needs to be developed in order to ensure that this issue is appropriately managed.</p> <p><u>Long Term Operation of Multiple Communications Hubs</u></p> <p>If gas first communications hubs are permitted there will be installations where multiple communications hubs form part of the enduring solution. This could lead to confusion regarding ongoing operational responsibility for each device and could lead to no party assuming responsibility for equipment under their control. For this reason strong governance is required to ensure that suppliers operating equipment at such locations are made clear of and accept their responsibilities.</p> <p><u>Removal of Redundant Communications Hubs</u></p> <p>ESQCR dictates that all equipment associated</p>	
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	<p>with the supply of electricity must be removed as soon as it is no longer needed or in use. Management of gas first communications hubs will need to comply with this regulation. It is difficult to see how this could be managed unless strict industry rules are developed to govern this process.</p> <p><u>Electrical Protection of the Communications Hub Power Supply</u></p> <p>The document seems to indicate that the gas first comms hub will be electrically protected by the network operators cut out fuse (section 2). This is not necessarily the case. Whilst suitably rated cables (meter tails) may be protected against over current it is unlikely that the power supply to the comms hub will be afforded any protection by the network operator's equipment.</p> <p><u>Gas First Comms Hub Power Consumption</u></p> <p>As detailed in question 1 significant additional work is required to define how power consumption associated with gas first comms hubs should be reconciled.</p> <p><u>Appendix – Use of Batteries as an Alternative to Mains Power</u></p> <p>This part of the document is weak. It does</p>	
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	<p>not state which manufactures have been consulted and validate the claims that have been made. It ignores the fact that battery powered meters are still the only solution being considered for locations where a HAN connection cannot be made between a gas smart meter and comms hub.</p> <p>The expected maximum battery life of 10 years could enable a workable solution especially given that meters will always need to be inspected at least every five years. On site battery exchange could be scheduled to be undertaken when meters are inspected.</p> <p><u>Network Operator Recovery of Cost</u></p> <p>The document needs to be developed to ensure all network operator costs associated with gas first comms hubs (emergency call outs, etc) can be recovered from the appropriate party.</p>	
<p>Electricity North West</p>	<p>There are a number of acronyms used throughout, some are in the glossary, others are not. We should either place them all there, or put them in full in the document.</p> <p>I don't like 'energization' and 'de-energization' DCUSA uses 'energisation'. And 'de-energisation'. Consider changing.</p>	<p>The WG agreed to review the guidance note for formatting.</p> <p>As discussed earlier, if the first item of smart metering equipment installed is SMETS2, it should be compatible with other equipment. Ultimately a single comms hub should be used for gas and electricity. But until the DCC is fully live, there might be two comms hubs</p>

	<p><b>Subsequent smart meter installation – Scenario B (ii) –</b> If SMETS2 has an internal communications hub is there a third option to connect the gas first installation to the SMETS2 meter? Is this a preferred solution or not?</p> <p>For the first instance of installation of the smart meter this is probably fit for purpose but I am trying to understand what the enduring solution will be even if it is some way down the line so that we understand what the end game is. Is it SMETS2 for both meters with the communications hub in the electricity meter or can SMETS2 be with or without a communications hub?</p> <p>Head End System is capitalised. We should add it to the glossary for understanding</p>	for DCC mandatory sites.
SP Manweb / SP Distribution	No comment.	Noted
British Gas	We have not identified any changes required at this stage	Noted
Npower	<p>We have the following specific comments to make:</p> <p><u>Section 2 – Communications Hub and Power Device – Technical Requirements</u></p>	<p>The WG agreed the make/serial number should be visible</p> <p>As previously discussed, the guidance note will be updated to state installers should</p>

	<p>Will the device have a make and serial number that will be visible once installed?</p> <p><u>Section 3 – Installation Process</u></p> <p>We suggest an additional sub-bullet point in bold text to re-enforce the understanding that the gas first installer must take account that a second installer will be visiting the site to install the smart electricity meter and that the metering equipment and environs should be left in an appropriate state for this to be achieved without hindrance  <u>We would also like to see the following addition to Section 3 – Installation Process</u>                  Add sub bullet point under “Installs Gas 1st connection device between cut-out and meter to read – “And consideration should be given to the second installation”</p> <p>Additional comments:-</p> <p><u>Section 3 - Installation Process</u>                  Bullet point 2 - Approaches customer and identifies .....  <b>How will this be done?</b>                  Bullet point 6 (sub point 1) Where space restrictions/built .....</p>	<p>make: reasonable endeavours to have no impact on electricity metering</p> <p>Space restrictions are a wider smart issue, as noted earlier.</p> <p>The WG considered reasons for aborting the gas first installation would be at the judgement of the installer. The WG did not consider the guidance note wording needed to be changed.</p> <p>The WG agreed to separate bullet 8 “notify relevant DNO/GDN...” into two points.</p> <p>The WG considered issues around electricity smart meter installations were wider than gas first.</p> <p>One WG member noted DECC had not resolved the issue of installations where meters had been built around so were not accessible.                  The WG did consider it might be useful to have this point in the second consultation.</p> <p>The WG confirmed the gas installer remains responsible for the gas installation.</p>
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	<p><b>Surely jobs will always be aborted in these circumstances? (Otherwise would need to determine which circumstances they wouldn't be).</b>                  Bullet Point 8 (If any of the above checks are failed.....)</p> <p><b>Unclear as to what this means? e.g. why would the DNO/GDN need to know about failed HAN reception? Should the notifications be in line with the MOCOPA incident reporting categories? Should the electricity supplier and/or MOp be notified in case there are plans to install electricity Smart within a few days of the Gas install? Would need to know of any hazard?</b></p> <p><u>Section 4 – Subsequent Electricity Smart Meter Installation</u>  <b>Where will SMETS 2 hub fit if SMETS 1 already in situ?</b></p> <p><u>Section 5 – Responsibilities and Liabilities</u>                  3rd paragraph – From the perspective of liability .....</p> <p><b>Will this approach result in the subsequent (electricity) installer becoming responsible for the gas installer's communications hub? .....and how does this compare to the statement in the DCUSA RFI - '...The</b></p>	<p>The WG appreciated the point on comms faults, and considered there would be a bilateral commercial agreement for the suppliers and party operating the hub (current gas MAM and electricity MOA). It was believed to be a foundation period issue primarily, where it was more likely there would be separate comms hubs for gas/electricity.</p>
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	<p><b>proposer has stated that they believe that the gas communications hub should remain under the ownership or control of the gas meter operator until the enduring solution for communications hub ownership has been agreed by industry...' ?</b></p> <p><u>Section 6 – Communications Faults</u> Add to paragraph 3 (In either circumstance, it is envisaged.....)</p> <p><b>how is 'operating' the hub to be defined, as presumably under these circumstances both gas and electricity supplier will be 'operating' the hub. (This may be a greater issue for the period prior to DCC go-live?)</b></p>	
<p>ScottishPower Energy Retail Ltd</p>	<p>The last sentence of the last paragraph on Page 2 states: <i>“It is an independent hub device as envisaged by DECC.”</i></p> <p>This seems rather too anecdotal and should either be supported by a relevant extract from a DECC ‘final’ publication, or make no reference to the DECC’s view at all.</p> <p><b><u>Installation Process</u></b> We are very concerned with the entire approach proposed here. While the gas supplier might well wish to make an</p>	<p>The proposer will look for a reference on the hub’s status.</p> <p>The WG considered it would be useful to add to the guidance note a point on temporary disconnection of the gas supply during the installation.</p> <p>The majority of the WG considered it would good practice, and useful, to notify customers up front so they can make provisions for the brief loss of supply,</p>

	<p>appointment, we see no pressing reason why the customer must be informed of the interruption to his electricity supply at that time and we are of the view that this is likely to precipitate increased call volumes to the electricity supplier and confuse customers. The other point here is that the gas supplier has no explicit obligation to inform the customer of an impending interruption to the customer’s electricity supply. If the interruption is to be as brief as indicated by the proposer (the suggestion is that the interruption will not be for more than a few minutes), we think it perfectly reasonable for the gas supplier’s representative to simply explain the need for such interruption during the visit, thus mitigating customer confusion and reducing the likelihood of calls to the electricity supplier.</p> <p>Ahead of any visit, the gas supplier and its operatives should be aware of any special needs the customer may have. However, that does not obviate the requirement for the operative to exercise best judgement during the visit itself.</p> <p><b><u>Responsibilities and Liabilities</u></b></p> <ul style="list-style-type: none"> <li>• Section 5 of the Guidance Document suggests that some ‘principles’ have</li> </ul>	<p>otherwise job could end up being aborted.</p> <p>The Smart Meter Install CoP covers customers’ special needs. The WG agreed to reference the SMICoP in the guidance note.</p> <p>It was noted that DECC’s consequential change group WG4, was working on definitions of metering/metering equipment together/combined.</p> <p>It was agreed to replace the second sentence re electricity and gas suppliers’ responsibility for electricity and gas equipment respectively.</p> <p>The WG confirmed that liability sits with owner of seals and agreed to reword that section of the guidance note.</p> <p>It was noted that wider definitions of smart equipment are still being developed. It was not clear what is the role of “hub operator” – should whoever is using / dialling up the hub when a fault is detected, take responsibility? This approach may be more complex DCC operating but not owning the hub.</p> <p>One WG member noted recent SMIP</p>
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	<p>already been established regarding liabilities <i>'for faults associated to metering equipment'</i>. However, no extant principles place obligations on electricity suppliers with regard to gas metering systems, or vice versa. Nonetheless, the SMIP's current position is that the DCC will be responsible for comms hub provision and ownership and, post DCC establishment, it is probable that while repairs to comms hubs might be carried out under the instructions of one or other supplier, the costs of such remedial work will be passed back to the DCC for subsequent socialisation across its user community. Notwithstanding such future arrangements, we consider those that might apply prior to DCC establishment to remain, for the time being, opaque.</p> <ul style="list-style-type: none"> <li>• "Original accredited installer" – does this relate to the gas comms, gas smart meter or electricity meter? If it is the electricity meter all visual proof will be lost when the seals are replaced to fit the gas comms. The statement does not, therefore, stand</li> </ul>	<p>documentation indicated the installing Supplier remains responsible for the comms hub until it is replaced or DCC comes in. Once this is defined, the guidance note could be update, but it is not for the gas first process to define this.</p> <p>It was agreed to create a new sub section on change of supplier to capture the point about new suppliers' use of existing equipment.</p> <p>WG agreed to amend section 7 "will take their power from the un-metered side of the incoming supply" to "...from the supply prior to the meter"</p> <p>The WG agreed to amend the working in the appendix as per the respondent's suggestion.</p> <p>The WG acknowledged the DCUSA breach clause has limitations in this scenario. It was noted that there is a MOCOPA escalation process for failure to meet its requirements. This could lead to expulsion, which would (under gas first) put the gas supplier in breach of the DCUSA.</p>
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	<p>up to basic H&amp;S principals.</p> <p><b><u>Communication Faults</u></b></p> <ul style="list-style-type: none"><li>• Section 6 identifies the responsibility for rectifying problems with the comms hub as resting with the “<i>party ‘operating’ the hub at the time of failure</i>”. It is unclear what is meant by this.</li><li>• The final paragraph does not seem relevant to the fitting of a gas first smart meter and should be included in some other, more suitable, document.</li><li>• More generally, where a gas 1st comms hub is owned by a MAP (with whom the gas supplier has a commercial relationship) it is likely the MAP will seek to recover rental costs from any electricity supplier relying on such comms hub for communications with the smart electricity meter. This is because independently owned comms hubs will not transfer to DCC ownership. Therefore the MAP will be likely to levy a charge only marginally below the costs for installing a secondary hub. Therefore potentially increasing</li></ul>	
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	<p>the costs of the overall roll out.</p> <p><b><u>Comms Hub Power Consumption</u></b>                  We are concerned that the wording in section 7 (“<i>will take their power from the unmetered side of the incoming supply</i>”) is potentially misleading. As unmetered supplies do exist, this could be construed as meaning that the supply is split between metered and unmetered sides, which is not the intent. Perhaps this could be revised to “<i>will take their power from the supply side of the incoming supply</i>”.</p> <p><b><u>Appendix</u></b>                  We also think it inaccurate for the appendix to state: “<i>Essentially none of these would be practicable without a mains power supply.</i>” In essence, the requirement is for an independent, robust, sustainable and continuous power supply, irrespective of whether it comes from the mains, solar, or some other arrangement.</p> <p><b><u>General Comments</u></b>                  The document should include breach controls, as these do not currently fit into any existing industry agreement. This is because the parties could be DNOs, electricity</p>	
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	<p>suppliers, gas suppliers, gas MAMs, electricity MOPs, MAP etc.</p> <p>The need to move or exchange a meter has not been mentioned. The document must explicitly say what is or is not allowed to take place.</p>	
SSE Energy Supply	<p>In Section 1, the second paragraph is not required as it is an opinion on the availability or otherwise of alternative communications hub technologies and should not form part of the guidance note.</p> <p>In Section 3, the Gas Supplier must ensure that the gas customer is the same as the electricity customer, so they can give permission for the temporary de-energisation. Where the gas and electricity customers are not one in the same person or the electricity customer is not present to give consent then the installation should be aborted.</p> <p>Section 3 must include that in the event of aborting at any stage of the installation, the Gas Supplier's agent must undertake the necessary action to safely re-energise the electricity meter.</p>	<p>As per previous discussions, the WG does not believe batteries are a feasible power supply for this type of device. It was agreed to remove that section from the guidance note.</p> <p>The WG agreed that it would be reasonable for the operative to assume that if responsible adult admits access to site, then they have the appropriate permissions to complete the work.</p> <p>The WG had previously discussed scenarios where the installation should be aborted.</p> <p>As previously discussed, installation constraints and multiple comms hubs are wider smart roll out issues rather than just gas first, and parties can raise these with DECC if they consider it appropriate.</p> <p>The WG wanted clarification of the point re</p>

	<p>Section 4 needs to include scenarios where a subsequent electricity meter installation is prevented due to the position of the “gas first” communications hub. Scenarios should consider where a “gas first” communications hub needs to be moved, where a second hub will not fit at the meter location, where an electricity smart meter with integrated hub will not fit at the meter location etc. In Section 4, the scenarios where two communications hubs and two IHDs are installed raise questions for DECC about the impact on the Smart Metering business case if the volumes are significant.</p> <p>The guidance note should also consider situations where the electricity meter has been de-energised and that the Meter Operator must ensure that any equipment attached before the meter (“gas first” communications hub) is also de-energised. This is required to ensure the Electricity Supplier remains compliant with the MRA and their Licence. De-energisation of the “gas first” communications hub would not be required if its usage is registered as an unmetered supply.</p>	<p>de-energisation of the gas comms hub. In the meantime, it considered it is covered in the legal text; the WG agreed to add it to the guidance note also.</p> <p>The WG confirmed that if the smart electricity meter was remotely “disabled”, the comms hub supply would stay on. But if it was fully de-energised, the gas comms hub would be switched off.</p> <p>The WG accepted the guidance note has limited use as is only guidance on DCUSA provisions.</p> <p>The WG agreed the ownership of the gas comms hub is a question for the gas arrangements.</p> <p>The WG confirmed DCP 127 did not intend to imply any liability of the electricity supply for the gas comms hub. The WG considered this is wider than the DCUSA Gas First guidance note but noted that direct damage was covered within the DCUSA.</p> <p>UMS issues had already been covered.</p> <p>The WG had agreed to remove the section on</p>
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	<p>In Section 5, a guidance note from DCUSA cannot make any statement on the Gas Industry governance arrangements of “gas first” communications hub. Therefore the first two paragraphs should be removed. Separately, the ownership of the “gas first” communications hub will need to be considered as it is not clear how the responsibility of the “gas first” communications hub transfers between Gas Suppliers on Change of Supplier (separate contracts may be required). This may need to be resolved under SPAA.</p> <p>Section 5 needs to be clear that the Electricity Supplier will have no liability for a “gas first” communications hub. This section also needs to include statements on the ongoing liability for the operation a “gas first” communications. What happens if a “gas first” fault impacts the supply of electricity to the customer? How are the financial and reputational impacts to the Electricity Supplier managed?</p> <p>Section 7, needs to clarify the arrangements for electricity consumption by a communications hub prior to the enduring Smart Metering arrangements being put in</p>	<p>battery power from the guidance note, thought would be reasonable to include in the Change Report and cost benefit paper.</p> <p>The guidance note will be reviewed for style/format.</p>
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	<p>place. Will the electricity consumption be treated as an unmetered supply and will BSCP520 be followed?</p> <p>The appendix on battery powered communications hubs should not form part of the guidance notes as it appears to be an opinion on the technical availability of alternative options which would fall outside DCUSA governance.</p> <p>The wording and style of the guidance note should be reviewed to ensure consistent use of language such as:</p> <ul style="list-style-type: none"><li>• “Shall” for mandatory statements</li><li>• “Should” for recommendations</li><li>• “May” for optional statements</li></ul>	
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Question Three	How should the guidance document be change controlled if at all?	Working Group's Comments
Health and Safety Executive (HSE)	n/a	Noted
Inexus Services Ltd	No response.	Noted
Western Power Distribution	<p>Consideration of this issue has to take in to account whether any of the information in the guideline imposes a requirement that is not governed elsewhere.</p> <p>For example, if the technical requirements for the gas communications hub are mandatory requirements and are not stated elsewhere under other governance then this guideline needs to be subject to full change control under DCUSA.</p> <p>If however, nothing in the guideline is a mandatory requirement then there seems little point in managing changes to it.</p>	Noted
UK Power Networks	<p>It would seem logical in some way for the document to fall under DCC governance to the extent that the comms hub is recognised as independent of the core statutory purpose of measuring energy (ie certified gas or electrical measuring elements). Placement of the document with one of the gas or electricity governances raises some doubt as to the means by which the non-core parties, ie gas licensee on electricity governance or electricity licensee on gas governance would</p>	Noted

	work.	
IMServ	No view.	Noted
Northern Power Grid	Northern Powergrid believes that the guidance document should definitely <b>not</b> sit under the DCUSA. The DCUSA is primarily a commercial document and is not a comfortable home for operational/technical guidance documents. Our view is that the guidance document should be place under MOCOPA to be governed as the MOCOPA panel sees fit.	Noted
National Grid Gas Distribution	No comments	
SSE Metering	This needs a full governance document in detail around the points raised above. In principle it is fine as an overview but in order to progress this, further detail is required.	Noted
SSE Distribution	We are very concerned that it is proposed that gas first installations should only be covered by “guidance notes” and “recommended practices”. This is wholly inadequate for governance of this activity, particularly to ensure that safety in all respects is given the utmost priority and not diminished by commercial imperatives. The document therefore needs to be developed into a set of mandatory rules. We have set out examples of why guidelines will not	The WG considered safety provisions are covered by MOCOPA and MAMCoP.  DNO provisions had been considered earlier.

	<p>suffice in our responses to questions 1 and 2. We suggest that such rules, once developed, should become a new schedule within DCUSA and therefore fall under established DCUSA governance processes.</p> <p>The RFI document includes a quotation on page 5 attributed to the UK Government which states that "...appropriate protection for the DNOs..." is required. The proposals as they stand do not meet this necessary standard in our view.</p>	
<p>Electricity North West</p>	<p>Within the document we indicate three possible outcomes associated with the guidance note.</p> <p><b>Code subsidiary document to DCUSA</b> – We do not include any such documents to DCUSA. This document more aligns with the Smart Energy Code or MOCOPA®</p> <p><b>Referenced within DCUSA</b> – No, this is nothing to do with DCUSA and more to do with the Smart Energy Code or MOCOPA®</p> <p><b>Serve its purpose</b> – it serves its purpose for this change proposal but we believe there are other instances such as gas second (which is not covered by the intent of this change proposal and is also made clear in the appendix of this change proposal) and new installations so we understand what to</p>	<p>Noted</p>

		expect from a SMETs compliant installation e.g. new connections in the future. Further development to this document or subsequent documents for other instances will be required.			
SP	Manweb / SP	Distribution	We would suggest under full DCUSA governance at least to begin with.	Noted	
		British Gas	The guidance document should be “owned” by the DCUSA Panel and should be updated from time to time as wider smart metering decisions are made that impact on the document.	Noted	
		Npower	Change control should be under DCUSA arrangements as the volume and type of issues that may arise from following these defined processes is, as yet, unknown. Therefore the only sensible approach is to initially ensure that some form of formal change control arrangements are put in place in order to guarantee consistent adherence and alignment to these processes once they have been agreed.	Noted	
		ScottishPower Retail Ltd	Energy	In its present state, we do not consider the guidance document sufficiently precise in its wording to have any real legal status; yet we recognise that there could be a requirement to change it at a later date. Consequently, we would support redrafting the document to	Noted

	make it fit for incorporation as a subsidiary document of either the DCUSA or MOCOPA and, therefore, subject to the relevant governance regime and change control process.	
SSE Energy Supply	<p>If the guidance document remains just guidance then it would be appropriate for new versions to be published by the DCUSA panel as required.</p> <p>However, the complexity of the matters covered would be better managed by defined rules and aspects of the guidance could be codified into a DCUSA schedule. However, some parts of the guidance relate to Gas governance matters and would need to be covered elsewhere.</p>	Noted