



Meeting Name DCP 127 Working Group

Meeting Date 8 January 2013

Paper Title DCP 127 Code Impacts - Code Administrator Responses

Purpose of Paper Information

Synopsis This paper collates the responses to date from Code Administrators confirming impacts of DCP 127 on other industry codes.

1 INTRODUCTION

- 1.1 DCP 127 Working Group action 009/03 asked ElectraLink to contact code administrators for the SPAA, BSC, MOCOPA, MAMCoP and MRA to confirm any code provisions that would prohibit or be impacted by the implementation of DCP 127.
- 1.2 This paper presents the responses received by 28 December 2012.

2 GEMSERV FOR THE MRA

- 2.1 The response from the MRA:

I have been asked to review DCUSA Change Proposal DCP127 relating to the arrangements for installation of smart gas meters with regard to consequential change to the MRA and our initial thoughts are that there is minimal MRA involvement in this matter.

While there does not appear to be any direct impact on electricity Registration, there is a potential issue regarding access to the electricity meter and supply cables/fuses.

Some governance may be required to allow the gas supplier to identify the electricity DNO/Supplier and/or MOP for a site, for several reasons:

- *Assessing the compatibility of the electricity meter*
- *Awareness of when the electricity meter is de-energisation at installation*

- *Awareness of any subsequent maintenance or de-energisation instances of in the future*

If this is the case, a process may need to be established for the gas Supplier to check these details in ECOES. To get access to ECOES parties would have to follow the defined application process. The Supplier would be responsible for any access granted to its agents.

In terms of communicating the gas hub installation across to electricity DNO and Suppliers, we presume there may need be data flows submitted in the future, so a subsequent DTC changes may have to be raised? As we understand, gas does not use the DTN, or data flows, therefore some form of consistent interface would be required. We welcome dialogue between industry participants to discuss the most effective way of communicating.

Further to the items discussed, we do not feel that DCP127 has any major consequential impact on the MRA, although implementation of any changes would require consent of Parties.

If you require any further information, please do not hesitate to get in touch.

3 JOINT OFFICE FOR THE UNC

3.1 The response from the UNC:

I have been informed by one of the Gas Transporters that this has been considered by the SPAA Smart Working Issues Group which was used as the development group for all consequential changes to codes for smart metering. This DCUSA change does not impact on the UNC, and British Gas have raised a SPAA change to mirror the DCUSA requirements for gas impacts.

4 GEMSERV FOR THE MOCOPA

4.1 The response from the MOCOPA:

Just to keep you updated, following the most recent MOCOPA Review Panel, the current version of the MOCOPA Change Proposal for gas first is current undergoing some revision.

I will forward you the up-to-date version of the change proposal in due course, which you can take as consideration of the impacts of gas first on MOCOPA. The MOCOPA Change Proposal is subject to acceptance by the MOCOPA Members

(Meter Operators and Distribution Businesses). It is anticipated that the timescales for voting on the MOCOPA change will closely align with DCUSA.

5 ELECTRALINK FOR THE SPAA

5.1 The response from the SPAA:

The group noted that the scope of DCP127 had been broadened to include guidance on the ongoing maintenance of smart meter devices.

The group re-affirmed that the equivalent Change Proposal in gas (SPAA CP 12/212) would need to be progressed in line with DCP 127.

The group further noted that DCP 127 would need to take into account CP 12/225 - and the equivalent UNC mod 430 and iGT UNC mod 047 - which seeks to include in MDD new allowable Meter Mechanism Types. Members noted that the inclusion of new allowable Meter Mechanism Types will enable market participants to determine on a change of supply whether a smart meter is on site.

Where customers have different Suppliers for gas and electricity, the group noted that on a change of supply, the new Supplier would not know that he is also responsible for the communication hub which had initially been installed. The group noted that approximately 20% of customers are single fuel customers, which would be affected by this issue.

6 ELEXON FOR THE BSC

6.1 The response from the SPAA:

We previously responded to the consultation and highlighted that there were no impacts from the BSC perspective. We have looked into this again and reviewed the guidance. Section L 1.2.3 of the BSC states that

'The principal functions of a Meter Operator Agent shall be to install, commission, test, maintain, rectify faults and provide a sealing service in respect of Metering Equipment (including if applicable associated Communications Equipment), in accordance with Party Service Line 100 and the relevant BSC Procedures and Codes of Practice'.

The BSC did not envisage for parties other than the appointed Meter Operator to undertake work on the electricity meter as such scenarios were not necessarily relevant before smart metering. However as per our previous assessment of

DCP127, **the BSC does not prohibit** this as long as the party about to undertake work on the meter is **qualified** to do so. The Gas meter worker (under MOCOPA) will have the relevant skills set to undertake such work which mitigates the risk of leaving the electricity meter non-compliant. We have the following considerations for the working group.

- Are there provisions in the DCUSA for informing electricity supplier and meter operator when a gas first installation has been undertaken to provide assurance to the Supplier/MOA that the site was left compliant?
- In the guidance Section 3 Installation process – ‘Inspects/risk assesses the electricity installation to confirm that the hub can be fitted. Where space restrictions/built around electricity meter installations are encountered, gas first installation will normally be aborted; (it is not envisaged that service position moves will be requested, but it may be appropriate to move the meter on the meter board).’ Who will undertake that activity? We believe moving the meter has more implications than just breaking the seals, and increases the risk of non-compliance.

As this becomes more prevalent, monitoring any issues that may arise as a result of gas first installation is essential and as a result an additional clause in the code to make provisions for such scenarios (and requirements) will ensure compliance from a BSC perspective.

7 RECOMMENDATIONS

7.1 The DCP 127 Working Group is invited to:

- Note the contents of the paper.