



## **DCUSA CONSULTATION**

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DCP 113 – DISTRIBUTORS TO AUDIT METER  
INSTALLATIONS AND INVOICE WHERE  
MISMATCHED METER INSTALLATIONS ARE  
IDENTIFIED

## **1 PURPOSE**

- 1.1 The Distribution Connection and Use of System Agreement (DCUSA) is a multi-party contract between electricity Distributors, Suppliers and large Generators. Parties to the DCUSA can raise Change Proposals (CPs) to amend the Agreement with the consent of other Parties and (where applicable) the Authority.
- 1.2 This document is a consultation issued to DCUSA Parties, ELEXON, MOCOPA and the Authority in accordance with Clause 11.14 of the DCUSA seeking Industry views on DCP 113 - Distributors to Audit Meter Installations and Invoice Where Mismatched Meter Installations are Identified.
- 1.3 Parties are invited to consider the Working Group questions along with the proposed legal drafting set out as Appendix A and submit comments using the form attached as Appendix B to [dcusa@electralink.co.uk](mailto:dcusa@electralink.co.uk) by **01 June 2012**.

## **2 DCP 113 – DISTRIBUTORS TO AUDIT METER INSTALLATIONS AND INVOICE WHERE MISMATCHED METER INSTALLATIONS ARE IDENTIFIED**

- 2.1 DCP 113 has been raised by Electricity North West Limited. The CP seeks to ensure that when a DNO identifies a possible mismatch between the meter and the CT ratio, through a review of its in-house data, the Supplier will be informed of the suspected error. Once informed, the Supplier will have 3 calendar months to resolve the issue before a site audit is scheduled by the DNO. The Supplier may be liable for the charges associated with the site visit audit, where the suspected error still exists.
- 2.2 The proposer considers that when a meter is commissioned it must always match the ratios of the CT for the installation. DCP 113, if approved and implemented, will provide greater accuracy within the settlement process for both new installations and existing exit points; which could minimise end Customers and Suppliers receiving incorrect billing statements.
- 2.3 The Proposer considers that this CP will ensure that Parties endeavour to resolve mismatched data in a timely manner, in an effort not to incur the cost of fixing the issue, and that of an audit. When a meter is commissioned it must always match the ratios of the CT for the installation. The Proposer believes

that this CP will ensure a greater focus /success will be achieved in matching the meter configuration to the CT that is in place. The benefits would potentially include a greater accuracy for the settlement process for both new installations and existing exit points. Greater accuracy of data is likely to lead to more accurate billing for Suppliers and therefore Customers.

2.4 The problem of mismatches between the ratios in the meter and installed CTs has always existed. To minimise the opportunity for error the Industry has initiated the following actions:

- BSCP514<sup>1</sup> requires the exchange of D0170 & D0215 dataflows so that the Distributor informs the Meter Operator of the CT ratios of the applied
- MOCOPA<sup>2</sup> has introduced (effective from Jan 2012) a requirement to place a label near the test terminal block stating the CT applied ratios
- A Modification has recently been raised under the BSC , P283<sup>3</sup>, to reinforce the commissioning requirements for CT metering arrangements

### **3 DCP 113 WORKING GROUP**

3.1 The DCUSA Panel established a DCP 113 Working Group which consists of Supplier, DNO and Ofgem representatives.

3.2 The Working Group has met on a number of occasions and developed the following process:

- Where the DNO identifies a possible mismatch between the meter and the actual applied CT ratio, the Supplier is informed (by email) of the issue, together with a copy of the VT/CT certificates for the relevant Metering Equipment
- The DNO will confirm to the Supplier that they have 3 calendar months from being notified of the error to resolve the issue, unless otherwise agreed between Parties, before a site visit audit is scheduled by the DNO;

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<sup>1</sup> [www.elexon.co.uk/wp-content/uploads/2011/10/bscp514\\_v23.0.pdf](http://www.elexon.co.uk/wp-content/uploads/2011/10/bscp514_v23.0.pdf) (see 5.2.2.6)

<sup>2</sup> [www.mocopa.org.uk/ramanualagreement.html](http://www.mocopa.org.uk/ramanualagreement.html) (see Appendix 2.3)

<sup>3</sup> [www.elexon.co.uk/mod-proposal/p283/](http://www.elexon.co.uk/mod-proposal/p283/)

- The Supplier may be charged for expenses that result from the site visit audit where the Supplier or their agent is at fault. The DNO may be charged for expenses and/or any resulting works resulting from incorrect information being supplied by the Distributor and for the site visit audit where no fault is found, or where the DNO is found to be at fault.; and
  - Irrespective of this process, whenever a DNO site visit identifies a metering error it shall be reported by the DNO to the Supplier, who will then inform the MOP (and/or Data Collector) and the issue should be dealt with in the time-frame of any standard metering fault.
- 3.3 The CP allows for a DNO to commence an audit if there is a suspected error at an exit point of any metering equipment on its network which has been identified through a mismatch data activity; where a review of their data can identify any discrepancies regarding the CT ratios of a site.
- 3.4 Where Parties are aware of an issue, then that should be resolved through the normal resolution processes. However when a fault is found and there is uncertainty as to whether there is an issue with the CT ratio; the DNO will progress with the process outlined above. This CP therefore relates to data where the CT ratio may not be correct and the DNO is not able to determine the reasons through a mismatch data activity. The DNO would not normally inspect the installation of the meter after the site had been energised, unless asked to do so.
- 3.5 In the case where the 3 calendar months pass without the issue being resolved, an audit may then take place in order to resolve the inaccurate data.
- 3.6 DCP 113 proposes that the audit charges mechanism be through a miscellaneous charge and not a Use of System charge.
- 3.7 A Distributor is currently commencing a general metering audit throughout their Licensed region(s) and to date they have identified that around 2% of the sites which have been audited have been identified as having meter issues; including a number of mismatched CT ratio errors. The BSC TAA Audit has a percentage well below 0.1% from a random selection and the Working Group

saw this as a material issue as it impacts Settlements.

- 3.8 The Working Group has proposed restricting the number of issues that a DNO can report to a Supplier, because if there was a significant amount of issues reported together it would be unrealistic to expect that the Supplier would be able to resolve them all within a 3 calendar month timeframe as proposed by the Working Group.
- 3.9 The audit will only be an option for DNOs, and it will be expected that the DNOs will work with Suppliers to resolve outstanding issues. The Working Group proposes that 50 issues per GSP Group per MPID should be the maximum amount of issues which can be reported to a Supplier in any 3 month period by a DNO. The Working Group recommends that as part of their proposed process when a confirmed metering error is identified and reported by the DNO to the Supplier, this should be passed to the MOP and resolved within the current time-frame of a normal metering fault.
- 3.10 However, if the DNO finds an error through a data cleansing process, this should be dealt with separately. The DNO will send a report to the Supplier with all the relevant information that is needed to resolve the issue.
- 3.11 The Working Group agreed that this process will be applicable to both NHH and HH CT metered sites.
- 3.12 The Working Group highlight that it is not the intent of the CP to have an impact on the losses process. However the Working Group has indicated that the CP may have an impact on losses incentive. The Working Group has indicated that metering errors impact losses and settlement accuracy. Should the fitting and commissioning of the matching equipment be resolved as a result of this CP, the amount of energy passing through settlement and therefore affecting the losses process may be reduced or increased. The expectation is that identified errors, positive and negative, would be progressed equally.

#### **4 PROPOSED LEGAL TEXT**

- 4.1 The draft legal text has been developed by the DCP 113 Working Group and is attached as Appendix A.

## **5 IMPLEMENTATION**

- 5.1 The proposed implementation date for DCP 113 is November 2012, as this will allow sufficient time for DNOs to submit any mismatched CT ratios errors to Suppliers, who will then be able to resolve any outstanding issues before the CP is implemented.

## **6 CONSULTATION**

- 6.1 The DCUSA Panel established a Working Group to assess DCP 113. The Working Group agreed that a Consultation should be issued to determine whether Parties are supportive of the intent of DCP 113 and the impact it would have on them if implemented.

- 6.2 Respondents are asked to consider the following questions:

- Do you understand the intent of the DCP 113?
- Are you supportive of its principles?
- Do you consider that the proposal better facilitates the DCUSA Objectives? Please provide supporting information.
- Please provide feedback on the proposed process set out in 3.2 of this document?
- For DNOs: Is your company in a position to identify discrepancies between in-house database records of Meter Technical Details provided by MOPs against DNOs Site Technical Details records of CT and VT ratios? If not, what systems would be required to allow you to identify the discrepancies and please give any applicable timescales for system upgrades? If this change progressed, then would you anticipate performing such checks? What level of charges would you expect to be recovered from Suppliers if an audit was performed?
- For Suppliers: What level of charges would you expect to be recovered from Distributors for works carried out resulting from incorrect data supplied from

### Distributors?

- If there is a known error, do you think that the resolution should be through the standard settlement process and timescales? And please explain if the current process fit for purpose?
- When a mismatch of the ratios of a meter is identified, is the proposed 3 calendar months resolution timeframe acceptable? Please provide supporting comments.
- The Working Group recommended that there should be a cap placed on the amount issues which a DNO could report to a Supplier within a 3 month time period, with 50 issues per GSP Group per MPID being the agreed amount. Do you agree that this is an acceptable limit? Provide supporting comments.
- Do you believe that the principle of charging either way for this sort of activity is appropriate or desirable? Please give supporting reasons.
- Do you feel that there are any issues, not identified by the Working Group, within DCP 113 which will impact IDNOs? Provide detailed comments as to any issue you would like examined further by the Working Group
- Do you agree with the proposed implementation date?
- Do you have any comments on the proposed legal text? Please provide comments as whether you believe the legal text meets the intent of the CP.
- Do you have any further comments on DCP 113?

- 6.3 Responses should be submitted using Appendix B to [DCUSA@electralink.co.uk](mailto:DCUSA@electralink.co.uk) no later than **01 June 2011**.
- 6.4 Responses, or any part thereof, can be provided in confidence. Parties are asked to clearly indicate which parts of the response are to be treated confidentially.

## **7 NEXT STEPS**

- 7.1 Following the end of the consultation period, the responses will be reviewed by the DCP 113 Working Group. The Working Group will then determine the progression route for the CP.
- 7.2 If you have any questions about this paper or the DCUSA Change Process please contact the DCUSA Help Desk by email to [dcusa@electralink.co.uk](mailto:dcusa@electralink.co.uk) or telephone 020 7432 3011.

## **8 APPENDICES**

- 8.1 Appendix A – DCP 113 Legal Drafting
- 8.2 Appendix B – Response Form
- 8.3 Appendix C – DCP 113 Change Proposal