

**DCUSA DCP 011 Consultation Responses – Collated Comments**

<b>Question One</b>	<b>Does the proposed CP better facilitate the DCUSA Objectives?</b> Please state which objective(s) and give supporting comments.
Central Networks East & Central Networks West	<p>Yes, by opening up the service provision to any Qualified party better facilitating competition in supply also clarifying the obligations of both DNO and IDNO parties, and therefore meets the following 2 DCUSA objectives: -</p> <p>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;</p> <p>the efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences.</p>
EDF Energy Networks	<p>Objective 2 is better met as competition in supply is facilitated through competition in metering and this change reflects underlying changes in the metering world.</p> <p>Objective 3 regarding the efficient discharge of Licence obligations is better met by reflecting changes to those Licence obligations.</p>
Electricity Northwest Limited	<p>As the sponsor of the change request our comments in this area are contained within the initial change proposal.</p>
Npower (Npower Ltd, Npower Direct Ltd, Npower Northern Ltd, Npower Northern Supply Ltd, Npower Yorkshire Ltd, Npower Yorkshire Supply Ltd, Electricity Plus Supply Ltd)	<p>The implementation of DCP11, which will align DCUSA with the changes that have taken place with SLC 36, 36A and 36C of the Distribution Licence and the changes introduced via BSC P197, will better facilitate the following DCUSA objective:</p> <p>“The efficient discharge by distributors of the obligations imposed upon them by their licence”.</p>
Scottish Hydro Electric Power Distribution plc; and, Southern Electric Power Distribution plc	<p>We believe that the proposed CP facilitates DCUSA objective:</p> <p>3.1.3 – the efficient discharge by the DNO parties and IDNO Parties of obligations imposed upon them in their Distribution Licences; and,</p> <p>3.1.4 - the promotion of efficiency in the implementation and administration of this</p>

	<p>Agreement.</p> <p>The revisions to SLC36, 36A and 36C have a direct impact on DCUSA and the CP facilitates the alignment of DCUSA with the terms of the revised Distribution Licence.</p>
Scottish Power Energy Retail	Agree with those stated in DCP
SP Distribution / SP Manweb	The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution licences will be improved by aligning the DCUSA to the changes that have taken place within SLC36, 36A & 36C of the Distribution Licence and BSCP197A.
The Electricity Network Company Ltd	-
Western Power Distribution (South West) plc and Western Power Distribution (South Wales) plc	We agree with the statement in the Change Proposal Form.
<b>Question Two</b>	<b>Are there any other alternative solutions you would like to be considered by the DCP 011 Working Group?</b>
Central Networks East & Central Networks West	None
EDF Energy Networks	No
Electricity Northwest Limited	None
Npower (Npower Ltd, Npower Direct Ltd, Npower Northern Ltd, Npower Northern Supply Ltd, Npower Yorkshire Ltd, Npower Yorkshire Supply Ltd, Electricity Plus Supply Ltd)	No
Scottish Hydro Electric Power Distribution plc; and, Southern	The definition of 'Legacy Basic Metering Asset Provision' should reference LC36 para 3, rather than para 2, as para 3 describes the services attributed to that term.

Electric Power Distribution plc	
Scottish Power Energy Retail	No
SP Distribution / SP Manweb	None
The Electricity Network Company Ltd	no
Western Power Distribution (South West) plc and Western Power Distribution (South Wales) plc	No
<b>Question Three</b>	<b>Do you consider the definition of 'Meter Operator' to be sufficient?</b> Please detail any proposed alternatives.
Central Networks East & Central Networks West	Yes
EDF Energy Networks	Yes
Electricity Northwest Limited	No comment
Npower (Npower Ltd, Npower Direct Ltd, Npower Northern Ltd, Npower Northern Supply Ltd, Npower Yorkshire Ltd, Npower Yorkshire Supply Ltd, Electricity Plus Supply Ltd)	<p>Under the BSC, the term Meter Operator Agent, rather than Meter Operator is used. Given that the DCUSA Definition explicitly references the BSC, it would seem advisable for the DCUSA and BSC terminology to be consistent.</p> <p>The BSC definition of Meter Operator Agent explicitly references both CVA and SVA, however the proposed drafting of DCUSA Clause 18.2.2 does not make such a clear distinction, rather it references Metering Points and Metering Systems. This inconsistency in terminology between DCUSA and the BSC, which could also impact Clauses 25.12, 27.1 and 29.6, and Schedule 7 of the DCUSA, may cause confusion.</p>
Scottish Hydro Electric Power Distribution plc; and, Southern Electric Power Distribution plc	Yes.
Scottish Power Energy Retail	Yes

SP Distribution / SP Manweb	Yes
The Electricity Network Company Ltd	yes
Western Power Distribution (South West) plc and Western Power Distribution (South Wales) plc	<p>No:</p> <p>The BSC definitions refer to Meter Operator <u>Agent</u> and Metering Equipment which is inconsistent with terminology within the DCUSA that refers to Meter Operator and Meter Equipment.</p> <p>There is also a more substantive issue where Metering Equipment is not whole current.</p> <p>The Meter Operator definition as proposed in this DCP links to "Metering Equipment" as a defined term with the meaning given in the BSC that refers to meters together with VTs, CTs etc. Contrary to the definition in the BSC, the MOA does not provide or have any responsibility for the VTs, CTs, multicore or meter panel. This equipment is generally installed by and owned by the DNO. The MOA is only responsible for the installation of metering beyond the interface which is generally a terminal block. Therefore in some instances the Meter Operator will not be responsible for <u>all</u> fieldwork and ancillary services.</p>
<b>Question Four</b>	<b>Please indicate if you expect to incur any costs to support the CP (particularly where these are related to internal system changes)</b>
Central Networks East & Central Networks West	We do not anticipate to incur any additional costs as a result of this Change Proposal
EDF Energy Networks	No
Electricity Northwest Limited	None
Npower (Npower Ltd, Npower Direct Ltd, Npower Northern Ltd, Npower Northern Supply Ltd, Npower Yorkshire Ltd, Npower Yorkshire Supply Ltd, Electricity Plus Supply Ltd)	We do not expect to incur any costs to support this CP.
Scottish Hydro Electric Power Distribution plc and Southern	None identified at this time.

Electric Power Distribution plc	
Scottish Power Energy Retail	No
SP Distribution / SP Manweb	None
The Electricity Network Company Ltd	no
Western Power Distribution (South West) plc and Western Power Distribution (South Wales) plc	None envisaged at this stage.
<b>Question Five</b>	<b>Do you support the proposed implementation date of 26 June 2008?</b> (please state alternative if applicable)
Central Networks East & Central Networks West	Yes
EDF Energy Networks	Yes
Electricity Northwest Limited	Yes
Npower (Npower Ltd, Npower Direct Ltd, Npower Northern Ltd, Npower Northern Supply Ltd, Npower Yorkshire Ltd, Npower Yorkshire Supply Ltd, Electricity Plus Supply Ltd)	We do support the proposed implementation date of 26 <sup>th</sup> June 2008.
Scottish Hydro Electric Power Distribution plc; and, Southern Electric Power Distribution plc	Yes
Scottish Power Energy Retail	Yes
SP Distribution / SP Manweb	Yes
The Electricity Network Company Ltd	Yes

Western Power Distribution (South West) plc and Western Power Distribution (South Wales) plc	Yes
<b>Question 6</b>	<b>Please state any other comments or views on the Change Proposal</b>
Central Networks East & Central Networks West	None
EDF Energy Networks	-
Electricity Northwest Limited	None
Npower (Npower Ltd, Npower Direct Ltd, Npower Northern Ltd, Npower Northern Supply Ltd, Npower Yorkshire Ltd, Npower Yorkshire Supply Ltd, Electricity Plus Supply Ltd)	<p>The defined term in the BSC is "Metering Equipment" not "Meter Equipment"</p> <p>There is a potential danger of the User and the Connectee appointing different persons to perform a "Meter Operator" role (at the same time), which could result in a Supplier being in breach of BSC provisions.</p> <p>The definition of Legacy Basic Meter Asset Provision refers to paragraph 2 of Condition 36 of the Distribution Licence, we believe the correct reference is to paragraph 3 of Condition 36.</p>
Scottish Hydro Electric Power Distribution plc; and, Southern Electric Power Distribution plc	None
Scottish Power Energy Retail	-
SP Distribution / SP Manweb	None
The Electricity Network Company Ltd	-
Western Power Distribution (South West) plc and Western Power Distribution (South Wales) plc	<p>Definition of Legacy Basic Meter Asset Provision:</p> <p>This was defined in Para 2 of Condition 36 in the previous version of the licence. This is not the case in the current version of the licence. It may be more appropriate to refer to paragraph 3 or if not omit specific reference to any particular paragraph.</p>