

Question 2: Have you identified any other relevant, suitable alternative solutions you would like to be considered by the DCP 008 Working Group that would better facilitate the DCUSA Objectives? Please provide your reasoning for such an alternative solution measured against the DCUSA Objectives.	
British Gas	<p>We believe metering activity should only be carried out once authorisation has been received from the Supplier. With effect from June 2008 British Gas will offer all our prepayment customers a dedicated 24 hour call centre facility. This call centre will handle calls from both customers and distributors in relation to prepayment customers only.</p> <p>In light of this we would like to ensure all prepayment customer calls related to metering are handled directly by British Gas in the first instance.</p> <p>We would suggest that DCP 008A could be amended in such a way that in instances where the Supplier offers 24 hour customer service, those calls related to metering activity must be referred to the Supplier. In addition any instances where the DNO is on site and finds a metering fault they should be obligated to contact the supplier before carrying out any activity.</p> <p>This solution would better facilitate DCUSA objective 3.1.2</p>
CE ELECTRIC UK	We have proposed alternative DCP 008B. We have no further proposals to make at this time.
Central Networks	<p>Please refer to 1.2 above. Central Networks believes that if UMetS is mandated on Distributors, then the most appropriate way to accommodate UMetS is for the Distributor to appoint a Mop to provide the service, and then charge the supplier on a transactional basis. The infrastructure including engineers, assets, data-flows and other systems and procedures already exists. The DNO or IDNO would receive the call on the 24/7 customer services line and instruct the Mop with whom they have contracted. Similarly should the metering fault be identified on a site visit, a call could be made to the Mop to carry out the work. Clearly the Distributor and Mop will make an appropriate charge to the Supplier for this service. In order to provide UMetS, we do not believe that in all circumstances the ideal of "first man on the scene carries out the repair" is a practical one. It would require an engineer and his van to be equipped with all the skills and materials needed to repair a distribution fault and a range of meters to resolve a metering fault. With metering faults identified over the telephone it may be possible for the first man to carry out the restoration, if this man is the Mop, however with site visits, a "two-van fix" would be the most cost efficient and practical solution, however we would hope to mitigate these instances by extensive diagnosis of the fault during the initial telephone call.</p>
E.ON UK	No
EDF Energy Customers plc	No
EDF Energy	No, although one may need to be constructed based on our proposals.

Networks	
Electricity North West Limited	No. ENW have raised DCP008D. This offers a service that is simple and easy to understand and places the initial obligation (meter fault identified) with the Supplier who is responsible for such a relationship. Should the initial request prove to be a metering fault, then the distributor will undertake UMetS in a non-discriminatory way. The other three proposals make the process more difficult to understand and manage.
energywatch	No
ESP Electricity Ltd	See comment above. ESP believes that none of the four DCUSA objectives are better facilitated. ESP do not have an obligation to offer UMETS and therefore, has no framework in place with meter operators or meter asset providers. The provision of such a framework would greatly increase the charges we would pass on to the Supplier should the service ever be utilised. We therefore feel that the Supplier should always be the first point of contact for a meter fault requiring meter replacement, providing them with the option of appointing a preferred agent to carry out the meter replacement work.
IPNL	No
Npower Group	No
Scottish Power Energy Retail Limited	No
SP Distribution / SP Manweb	No
SSE Energy Supply Limited	No
SSEPD	None
The Electricity Network Company Ltd	Despite its name, the primary focus of Umets is the restoration of supply – not the replacement of metering. We contend that the current proposal is outside the scope of the DCUSA objectives and therefore does not better facilitate the DCUSA Objectives. DCUSA solely relates to use of the distribution system. Therefore we contend that the DCUSA is better facilitated if metering activities (including the replacement of metering) are not covered by the DCUSA. The obligation to replace faulty metering sits squarely on the shoulders of the supplier. Whilst we may consider undertaking limited works, such as tightening screws where metering tails are loose, (and have already done so in respect of connections to our network), the changing of metering is a wholly different activity. Under the standards of performance regulations, where a fault that is reported out of working hours (as prescribed by the regulations) the standards apply as if the fault was reported at the start of the next day. The standards for UMETS should be no more onerous than those in place for distributors in respect of supply

	<p>restoration.</p> <p>However, the Standards of Performance Regulations only apply in respect of work on the distribution system; e.g. the replacement of the service fuse. They do not apply in respect of UMets activities. The drafting does not specify or link to any performance standards (or to any remedies for non-performance) We do not offer metering services. Therefore if we were obligated to offer UMets we would have to set up framework contracts with providers on a GB wide basis. The infrastructure costs of setting up such an operation would need to be recovered in addition to any transactional costs. We believe that the transactional numbers would be very low and that a supplier would be able to procure this service at a much lower cost directly from service providers rather than from us as an IDNO distributor. This is because within a GSP Group there could be more than distributor operating.</p> <p>Paragraph 3.5 of the consultation identifies that the provision of UMets is not required for half hourly metered sites or sites fitted with CT metering. Typically such sites will use much more electricity than domestic premises. Where such metering fails the customer continues to receive a supply of electricity. Such consumption will be unrecorded and require subsequent estimation.</p> <p>We question that where supply restoration is the critical factor, why it is unacceptable for supply to be restored to domestic premises without the fitting of metering (e.g. by shorting out the meter) but acceptable for sites with CT metering to receive and to continue to receive a supply of electricity pending resolution of the meter fault. This is an area that should be explored further.</p> <p>Is the priority to restore the supply, or to restore the supply only where a meter can be fitted? The former is a service the LDSO can readily provide, the latter is for the supplier. Estimated data can be used for the time where a meter is not used. The consultation has not considered this option. It is accepted that changes to other industry codes may be required. It is also recognised that there is a risk that where such an action is undertaken there the distributor will fail to report the action or the supplier may fail to undertake appropriate remedial works following the action (for a variety of reasons). However we believe that such issues can be dealt with contractually.</p> <p>The obligation would then be for a supplier to ensure that the site is revisited within a prescribed timescale following restoration of supply. There should also be an obligation on the supplier to ensure that premises are visited within a prescribed timescale (next working day?) where a distributor (in providing UMets) fits metering with a different functionality than that required by the tariff.</p> <p>This approach would require a second visit to the premises; however, the proposal requires only that a single credit rate meter be fitted in dealing with a metering fault; as such this would require a second visit would if different metering is required.</p> <p>Whilst we recognise that parties may look at the proposal with horror and contempt in the meeting room, we would be surprised if parties asserted that such actions were never taken by operatives on the frontline in order to ensure that supplies to 'vulnerable' customers were restored.</p>
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	<p>It is recognised that 'losses' are an important issue to distributors and supplies without metering allow for consumption to be understated. However we also note that Schedule 6 places an obligation on distributors to publish a scheme for recovering the value of electricity where it is not in pursuance of the supply contract. To date we understand no distributor has done this.</p> <p>In respect of vulnerable customers has any work been undertaken to quantify the size of the problem? – surely this is relevant to the solution?</p> <p>We believe that this better meets the objectives because it relates to providing use of system. We recognise that this may raise compliance issues in respect of Section 7 of the Act. However, this is no different to circumstances where a customer receives a supply (and is allowed to receive a supply) where CT metering is fitted.</p> <p>Again, it's about deciding what the priorities are, particularly in respect of 'vulnerable' customers.</p>
Western Power Distribution (South West) plc and Western Power Distribution (South West) plc	No