

Question 8: Do you feel that the one or more of the Alternatives proposed by individual Working Group members (DCP 008B, DCP 008C, DCP 008D) better facilitates the DCUSA Objectives and/or provides a better UMetS service compared to the Working Group's refined proposal DCP 008A? If so, please rank DCP 008A-D in order with reasons.											
British Gas	We believe DCP 008B would better facilitate DCUSA objective 3.1.2										
CE ELECTRIC UK	<p>Yes, we believe that DCP 008B better facilitates the DCUSA objectives as it facilitates competition in the provision of metering services, whereas the other proposals would restrict such competition DCP 008B provides a better UMetS service compared to the working group proposal as it:</p> <ul style="list-style-type: none"> <li>• is in line with the changes made to the distribution licence on 1 April 2007 which removed all obligations on distributors to provide metering services (except for legacy basic meter asset provision);</li> <li>• supports the move away from distributors as monopoly providers of metering services;</li> <li>• recognises that some distributors do not run affiliate meter operator businesses and are unable to provide UMetS at the level specified by DCP 008A, 008C and 008D without significant cost implications;</li> <li>• encourages the development of a commercial market for the provision of UMetS in line with a competitive metering market;</li> <li>• ensures that the section 11/ section 11A statutory process for changing licence obligations on licensees is not effectively circumvented by DCUSA given that compliance with DCUSA, as from time to time amended, is a licence obligation;</li> <li>• supports the move already made by one major supplier to source 24/7 UMetS via commercial meter operators; and</li> <li>• removes any need for control of charges for UMetS as charges will be set within a competitive market and driven by market forces.</li> </ul> <p>In summary, to rank all the proposals in order of preference:</p> <table border="1"> <thead> <tr> <th>Rank</th><th>Option</th><th>Reason</th></tr> </thead> <tbody> <tr> <td>Preferred</td><td>008B</td><td>Best facilitates the DCUSA objectives as it enables competition in the provision of metering services</td></tr> <tr> <td>Second</td><td>008D</td><td>Only provides for UMetS during site visits but does not allow opt-out by either suppliers or</td></tr> </tbody> </table>		Rank	Option	Reason	Preferred	008B	Best facilitates the DCUSA objectives as it enables competition in the provision of metering services	Second	008D	Only provides for UMetS during site visits but does not allow opt-out by either suppliers or
Rank	Option	Reason									
Preferred	008B	Best facilitates the DCUSA objectives as it enables competition in the provision of metering services									
Second	008D	Only provides for UMetS during site visits but does not allow opt-out by either suppliers or									

			distributors. Allows the distributor to specify the service level provided.
	Third	008A	All suppliers and distributors obliged to provide and accept the same basic service in specified situations including when the fault is identified during the customer call. Avoids supplier opt-out causing pricing issues (see below).
	Fourth	008C	Distributors obligated to provide a basic service in specified situations including when the fault is identified during the customer call. Suppliers can opt-out which may cause pricing issues (see below).
Central Networks	The only Alternative proposed by the Working Group that Central Networks believes it is able to support is DCP 008B. By following this proposal, Central Networks could respond to UMetS customers by contracting with a Mop to carry out the repair. This is the most appropriate route for a Distributor given the proportionately small number of instances that fit into this criteria. All in-hours work should be referred to the supplier for them to instruct their Mop with whom they have contracted, leaving out of hours work only to be considered. The only way in which we could consider supporting any of the other Alternatives would be by abandoning the "first van principle", in which case we could support DCP 008D, allowing the Distributor to contract with a Mop to provide the UMetS service. We do however believe that extensive fault diagnosis during the initial telephone call should mitigate the number of incidences.		
E.ON UK	As stated in the answer to the first question we do not believe that any of the alternatives better facilitate the DCUSA objectives. As to which option provides the best option then we believe a fundamental decision needs to be made as to whether UMETs is carried out by the first attendant on site or not. If it is this scenario then the responsibility for this service can only lie with the Distributor because in a true UMets situation they will always be first on site. If it is believed that this is not necessarily for the first attendant to replace the meter then it would seem sensible for the Distributor to contract this service with a Meter		

	<p>Operator. This would be the least cost to the consumer with each distributor contracting once in each area and only having one point of contact rather than each supplier contracting separately and the Distributor having to carry lists of each individual Suppliers Meter Operator.</p>
EDF Energy Customers Plc	<p>We believe that the Working Group's refined proposal DCP 008A provides the best UMetS services compared to the three alternatives proposed, by providing a reasonable service in each of the scenarios and recognising the industry changes documented in section 3.3 of the Consultation Paper.</p> <p>We note that DCP 008C and DCP 008D are similar to DCP 008A but result in different responses to some of the scenarios. We do not agree with these combinations, i.e. we do not agree that UMetS should be applied to Scenarios 2 and 3 (DCP 008C) or Scenario 5 but not Scenario 4 (DCP 008D).</p> <p>We do not believe that DCP 008B is acceptable as it may lead to different levels of service for customers in different areas or on different distribution networks.</p> <p>For the above reasons, we rank the alternatives as follows:</p> <p>DCP 008A – preferred option as best balance;</p> <p>DCP 008C – acceptable as similar to DCP 008A but UMetS not necessary for Scenarios 2 and 3;</p> <p>DCP 008D – not acceptable as we would wish UMetS to apply to Scenario 4;</p> <p>DCP 008B – not acceptable as does not provide a uniform service.</p>
EDF Energy Networks	<p>All are neutral to the objectives.</p> <p>A - gives too many scenarios for distributors to manage. This will be costly and may inevitably lead to the wrong course of action being taken. We would prefer to have absolute certainty that can be applied in all circumstances regardless of supplier, MOP hours, vulnerability etc.</p> <p>B – gives suppliers an opt-out so means distributors have to manage different levels of service for different suppliers. Also gives too many options to suppliers who will not know what will be done on any occasion. In the same way that we prefer a degree of certainty we imagine that suppliers require the same.</p> <p>C - requires the distributor to become an out of hours MOP service. This is beyond the reasonable scope of DCUSA (and may have procurement issues) and competition in metering should mean that suppliers either procure sufficient hours of service from their MOPs or risk losing customers to a supplier that does.</p> <p>D - provides a better service for distributors to manage and gives suppliers certainty over what range of actions will be taken by any distributor. However, it may be better for suppliers if all distributors offered the same level of service (whatever that might be).</p> <p>Ranking D-B-A-C</p>

Electricity North West Limited	<p><b>Ranking:</b></p> <p><b>DCP008D</b> – This proposal identifies under which scenario a service will be offered and splits the service dependant upon the requirement. If at the time of the call it is identified that it is a metering fault then this should be passed to the Supplier who should be responsible for offering such a service. It is not a distributor licence obligation. However, it is recognised that to visit site and walk away is not good service for the Customer and the industry so we believe that UMetS should be offered at this time on a non discriminatory basis.</p> <p><b>DCP008A</b> – This proposal identifies the service but differentiates within the Domestic Customer Group thus allowing for a Distributor to have to walk away when the capability to change the meter may be available. It also allows for a Distributor to have to provide a service that the Supplier should be obliged to offer having identified that it is a metering fault at the time of the call.</p> <p><b>DCP008C</b> – This option puts more responsibility onto the Distributor but allows for a Supplier to opt out leaving the Distributor fronting the calls with a need to understand each Supplier position at this point in time and also when in front of the Customer. So in some instances we may have to say 'No' and on others 'Yes' irrespective of whether the Supplier has an alternative service in place. In other words we may be told not to offer a service but equally the Supplier may also not offer a service thereby leaving the Customer without a service provision.</p> <p><b>DCP008B</b> – it is difficult to assess this one since it is not clear what will be provided (if anything) and equally the impact on the Customer should a Supplier not wish for such a service to be provided. It is also not clear as to what happens after UMetS has been undertaken. There are certain generic clauses (contained within the other proposals) that should be added to this proposal.</p>
energywatch	<p>Overall DCP008C appears to provide the most protection for consumer whilst still allowing suppliers to provide their own service if they choose to. If Ofgem chose to approve this proposal it would need to ensure that adequate measures were in place in the event that a supplier opted not to take UMetS from a DNO and decided not to provide an out of hours service to its customers.</p> <p>energywatch empathises with those DNOs who no longer have a metering business and would urge Ofgem to carry out a full cost analysis with regards to these companies.</p> <p>energywatch would rank the proposals in the following order:-</p> <ol style="list-style-type: none"> <li>1 008C</li> <li>2 008A</li> <li>3 008D</li> <li>4 008B – The risks associated with this model are : - <ul style="list-style-type: none"> <li>o no change will take place and this situation will continue as before.</li> <li>o Nothing may happen for some time &amp; consumer detriment may increase</li> </ul> </li> </ol>

ESP Electricity Ltd	<p>ESP would support the DCP008B alternative proposal due to the fact that it provides the distributor with the CHOICE to provide UMETS as it is not obliged to do so under the distribution licence. Where the Distributor does offer UMETS it provides recovery of costs through the Relevant Charging Statement and therefore Suppliers would incur the costs should they procure the distributor's UMETS. Where the Distributor does NOT offer UMETS, it allows the Supplier to appoint and procure alternative services from another service provider (and in the first place, offers the Supplier a CHOICE to use a distributor for UMETS or not). ESP do not support the other variations due to the fact that, predominantly, they do not offer a choice to the distributor to offer a UMETS or not, and at the risk of repetition, as this is NOT a licensed obligation we do not feel the DCUSA can enforce such an obligation.</p>
IPNL	<p>We do not support the proposal nor any of the alternative proposals. DCP008B proposes that distributors should be able to set up such services at their discretion. This would create a two tier service across the UK with some areas offering the service and others not. This would be further compounded where an upstream network to ours offered the service, but we did not. If there are distributors who wish to offer this service then it should be outside of the DCUSA and outside of their regulated activities.</p>
Npower Group	<p>We believe that DCP08C provides a better UMeTS service for customers, than that contained within DCP08A as this Option:</p> <ul style="list-style-type: none"> <li>• Provides a UMeTS service to all Vulnerable Customers both In and Out of Hours, thereby ensuring a speedy one-stop response to such customers and</li> <li>• Provides a UMeTS service to Non-Vulnerable customers Out-Of-Hours, thereby ensuring that these Non-Vulnerable customers are also off supply (regardless of the reason for the loss of supply) for the shortest possible period of time.</li> </ul> <p>In addition, Option C also provides the ability for Suppliers to "opt out " of any DNO Service if they wish to develop/provide an alternative service for their customers.</p> <p>Our ranking for the remaining Options is as follows:</p> <p>2<sup>nd</sup> place – Option A</p> <p>This option is not as favourable as Option C as it does not cater so well for Vulnerable Customers whose Metering Faults are identified Over the Phone In Hours, nor for Non-Vulnerable customers whose metering faults are identified over the phone Out of Hours. The Option also does not provide Suppliers with the ability to "opt out" of the service should they wish to develop/provide an alternative service.</p> <p>3<sup>rd</sup> place – Option D</p> <p>This Option requires vulnerable customers whose loss of supply is identified as being due to a metering fault to contact their Supplier to resolve the issue. In some instances, especially out of hours, this could result in the customer being off supply for an unacceptable length of time.</p>

	<p>4<sup>th</sup> place – Option B</p> <p>This Option enables a Distributor to elect to provide the service, in which case they must publish their charges in the Relevant Charging Statement, or to elect not to provide a service. We have a number of concerns with this stance:</p> <p>a) There will be no consistent stance regarding the provision of UMeTS service across the industry, which could lead to confusion and poor customer service</p> <p>The drafting does not detail any termination clauses that a Distributor would have to comply with if they elected to stop offering a service, which could lead to Suppliers being in a position whereby they have no provision for this service in place at a point in time, which clearly would not be advantageous for the end customer.</p>
Scottish Power Energy Retail Limited	<p>SPERL ranks the proposals as follows (1 Most Preferred – 4 Least Preferred)</p> <p>1 DCP008C Provides the best level of cover to the suppliers and customers, however SPERL would like to see it amended to include Scenario 5 as a UMeTS event and include the requirement to replace the meter like for like where reasonably possible.</p> <p>2 DCP008A Concern that Non Vulnerable customers would be referred to their supplier (2). Even with the appropriate call screening there is the possibility that the suppliers MOP could attend a Distribution fault, which would result in a second visit by the DNO.</p> <p>3 DCP008D Again concern that both Non Vulnerable and Vulnerable customers would be referred to their supplier. Even with the appropriate call screening there is the possibility that the suppliers MOP could attend a Distribution fault, which would result in a second visit by the DNO.</p> <p>4 DCP008B Would result in a patchwork provision across the Networks. SPERLs preference is for a consistent minimum service across all DNOs.</p>
SP Distribution / SP Manweb	No
SSE Energy Supply Limited	No, but the Working Group proposal puts an obligation on the Supplier to take UMeTS and this could be detrimental if the Supplier has commercial agreements in place with Meter Operators to provide an Out of Hours service.
SSEPD	<ol style="list-style-type: none"> <li>1. DCP 008B</li> <li>2. DCP 008A</li> </ol>

	<p>3. DCP 008 D</p> <p>4. DCP 008 C</p> <p>Ranked in order of the level of appropriate UMeTS response by a DNO in light of varying degrees of DNO structure and provide such services.</p>
The Electricity Network Company Ltd	<p>In principle we support the alternative proposal put forward by CE-Electric UK in DCP 008B</p> <p>We believe that this better facilitates the DCUSA in that it doesn't force a distributor to offer services outside the scope of its distribution licence but provides a framework for those parties who wish to offer services. As with the working group solution the proposal does not provide a disputes resolution mechanism, we assume that this would be detailed in the relevant charging statement. Given that such services are outside the scope of the licence then they would be outside the scope of the Ofgem's remit to resolve (unless such disputes were referred to Ofgem under competition law).</p>
Western Power Distribution (South West) plc and Western Power Distribution (South West) plc	<p>Whilst we do not believe either the proposal as developed by the Working Group or any of the alternatives better facilitate any of the DCUSA objectives we would rank them in the following order:</p> <ul style="list-style-type: none"> <li>• DCP008B: this provides choice to both DNOs and Suppliers and does not distort competition in the provision of metering services.</li> <li>• DCP008A: this focuses on vulnerable customers other than scenario 6 that we do not support.</li> <li>• DCP008D: we believe that UMeTS should be solely focused on vulnerable customers.</li> <li>• DCP008C: although this proposal provides choice to Suppliers it imposes an obligation on DNOs to provide the service and consequent significant set up costs without the ability to determine a reasonable charge for the provision of services based on an estimated volume and reasonable return.</li> </ul>