

DCP 008 – CHANGE DECLARATION

	WEIGHTED VOTING		
	DNO	IDNO	SUPPLIER
DCP 008A	Reject	Reject	Reject
DCP 008B	Reject	Reject	Reject
DCP 008D	Reject	Reject	Reject
IMPLEMENTATION DATE	Accept	Reject	Reject
RECOMMENDATION	<p>Change Solution – REJECT. In respect of each Party Category that was eligible to vote, the sum of the Weighted Votes of the Groups in that Party Category which voted to accept the change solution was less than 50% in all Categories.</p> <p>Implementation Date –REJECT. The sum of the Weighted Votes of the Groups which voted to accept the variation was not greater than 50% in all Party Categories.</p>		
PART ONE / PART TWO	Part One – Authority Determination Required.		

SUMMARY OF VOTES

PARTY	DCP 008A	DCP 008B	DCP 008D	IMPLEMENTATION DATE
DNOs				
Central Networks East	Reject	Accept	Reject	Accept
Central Networks West	Reject	Accept	Reject	Accept
EDF Energy Networks (EPN)	Reject	Reject	Accept	Accept
EDF Energy Networks (LPN)	Reject	Reject	Accept	Accept

EDF Energy Networks (SPN)	Reject	Reject	Accept	Accept
Electricity North West Limited	Reject	Reject	Accept	Accept
Northern Electric Distribution Ltd	Reject	Accept	Reject	Accept
Scottish Hydro Electric Power Distribution plc	Reject	Reject	Reject	Reject
Southern Electric Power Distribution plc	Reject	Reject	Reject	Reject
SP Distribution	Accept	Reject	Reject	Accept
SP Manweb	Accept	Reject	Reject	Accept
Western Power Distribution (South Wales) plc	Reject	Accept	Reject	Accept
Western Power Distribution (South West) plc	Reject	Accept	Reject	Accept
Yorkshire Electric Distribution Ltd	Reject	Accept	Reject	Accept
IDNOs				
Independent Power Networks Limited	Reject	Reject	Reject	Reject
The Electricity Network Company Ltd	Reject	Reject	Reject	Reject
Suppliers				
British Gas	Reject	Reject	Reject	Reject
EDF Energy Customers	Accept	Reject	Reject	Accept
E.ON UK Group	Reject	Reject	Reject	Accept
RWE Npower Group	Reject	Reject	Reject	Reject
ScottishPower Energy Retail Ltd	Reject	Reject	Reject	Reject
SSE Energy Supply Limited	Reject	Reject	Reject	Reject

SUMMARY OF COMMENTS

DNOs

Central Networks East	None
Central Networks West	None
EDF Energy Networks (EPN)	<p>Although none of the various scenarios fully reflects our preferred solution or current service, DCP008D more closely aligns with it.</p> <p>DCP008A seeks to require distributors to provide an out of hours metering service for vulnerable customers where the supplier has chosen not to provide such a</p>

	<p>service through their meter operator. This does not seem reasonable as it is within the supplier’s gift to procure such a service from their appointed agent directly. The definition of vulnerable customers is quite vague and will be difficult for a call handler to determine. In addition DCP008A gives no indication of the timescale within which the distributor is expected to provide UMetS where a metering fault is identified for a vulnerable customer over the phone outside of working hours. It also gives different levels of service on site depending on time of day and customer type that would prove difficult to manage and it is unclear of what would happen if the distributor provided UMetS where it was not “obliged to” (e.g. if a pragmatic approach is taken to arriving on site one minute outside of working hours).</p> <p>DCP008B gives too much optionality and would be difficult to manage.</p> <p>DCP008C gives a clear approach for distributors that is black and white - if you are on site you should endeavour to restore supply. This is good customer service and under this version there is no need to know who the customer is, what the time is, who the supplier is, what their contract with their MOP is etc. Instead it says that if the given electrical circumstances exist you must act accordingly. It also puts the obligation for obvious metering matters (identified through the phone call) where it belongs – with the supplier.</p> <p>In our view DCP008C gives the most clear description of a UMetS service that can be clearly communicated to field operatives and gives no doubts as to what action should be taken in which circumstance.</p>
EDF Energy Networks (LPN)	Please see comments for EDF Energy Networks (EPN) above
EDF Energy Networks (SPN)	Please see comments for EDF Energy Networks (EPN) above
Electricity North West Limited	<p>Proposed solution</p> <p>There are a number of areas that need to be considered in determining the correct option:</p>

	<p>Who has responsibility for metering activity? Does the industry want an Urgent Metering Service (UMetS)? Under what scenario such a service should be offered? What meter should be installed? Does it improve the DCUSA objectives?</p> <p>Who has responsibility for metering activity?</p> <p>It is clear from the Licence obligations that the Distributor is no longer required to offer metering services. Some Distributors have walked away from such a service and Independent Distribution Network Operators (IDNO's) may not offer such a service. With this in mind it has been argued that this provision sits firmly with the Supplier to procure through their Meter Operator (Mop), yet most Suppliers do not offer a 24/7 metering service thereby leaving the Distributor to handle the call from the Customer and deal with the Customer if the fault to the metering equipment is found while on site. Distributors are then left with a non contractual and non licensed situation with a differing service being offered. Such a situation results in a non consistent approach, across Great Britain, to the detriment of the Customer.</p> <p>Does the industry want UMetS?</p> <p>When you consider the responses to the consultation it is quite evident that Suppliers want UMetS. Option DCP008C, which was rejected by the Working Group and the Panel, actually received a majority support from Suppliers because it mandated the Distributor to provide the service and had more scenarios where UMetS was required. It is obvious that Suppliers see this as a way of passing on a service to their Customer in place of offering a 24/7 Mop service. It must also be noted that it was the least supported choice of the Distributors.</p> <p>From a Distributor perspective opinions are mixed. Those Distributors who have stopped providing such a service, and the IDNO's, are opposed since they would have to set up such a service or procure such a service from the Mops. They firmly believe that this is a Supplier responsibility. If the Distributor needs to</p>
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	<p>procure a Mop to undertake such a service why can't the Suppliers do the same? Those Distributors who have maintained or have procured a metering option don't face the same hurdles. If the Distributor identifies at the time of the call that it is a metering problem, this should be passed to the Supplier to handle irrespective of the time of day. It is their responsibility.</p> <p>Once again, the issue of licence obligations is being raised. Why place such an obligation on the Distributor without a change to its licence? Why not tighten the Supply Licence?</p> <p>The incident rate is seen to be low but can have significant impact when such an instance occurs.</p> <p>The Authority believed in 2002 that such a provision should be implemented. ENW raised this change proposal to complete the work undertaken by REMA at that time and move the issue forward due to the Distributor no longer being mandated to offer metering services through its licence in April 2007.</p> <p>In the interests of the complete Customer experience in meter operator services UMetS needs to be provided. This is recognised in the Gas market by the introduction of bi-lateral agreements between the gas distributors and Suppliers under draft guidelines provided by the Authority which set out their expected best practice. It is clear that should this arrangement be to the detriment of the Customer the Authority may consider appropriate licence obligations.</p> <p>Under what scenario such a service should be offered?</p> <p>The Working Group considered eight scenarios.</p> <p>In the case of DCP008A UMetS is to be provided out of hours for vulnerable Customers even if it is identified as a metering fault at the time of the call, yet while on site UMetS will be provided, unless the Customer is non vulnerable, during normal working hours. Under this scenario the Distributor will 'walk away' even though he may have the necessary meter in the van.</p> <p>DCP008B offers no scenarios within the legal text, leaving it up to the Distributor to determine and indicate within its Relevant Charging Statement. This will result in Suppliers being provided with a variety of UMetS services dependant upon what</p>
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	<p>the Distributor wishes to offer. Under certain situations, this option could result in no service at all i.e. a Distributor may not offer UMetS. Alternatively, where such a service is offered a Supplier may opt not to accept UMetS and may not have another metering provision in place (i.e. out of hours service). In both instances we are adding a level of complexity. From the Supplier perspective what is being offered by each Distributor and from a Distributor perspective which Suppliers are taking the service.</p> <p>DCP008D recognises that metering is a Supplier obligation and as such if a call is received for a metering fault it will be passed to the Supplier, whereas UMetS will be provided while 'on site' on a non discriminatory basis. In the first instance this places the obligation on the Supplier to undertake metering activities when identified (in or out of hours). It should be far simpler to offer such a service since they have the Supplier/Mop relationship than to involve a third party and would ensure that the correct meter is installed. UMetS is undertaken in the latter instance when it is only identified while on site. Rather than walk away a meter would be installed. This in our opinion is the true meaning of UMetS.</p> <p>What meter should be installed?</p> <p>The REMA work identified a number of activities that could be undertaken by UMetS. However with the move away from metering services by Distributors the Working Group's view (contained within DCP008A) was that this needs to be kept to a simple service by installing a single rate credit meter together with the replacement of any associated tails.</p> <p>DCP008B leaves such a service up to the Distributor which may include some of the services previously identified by the REMA Working Group such as like for like replacement and/or emergency credit on prepayment meters.</p> <p>DCP008D offers as a minimum the single rate credit meter but allows further flexibility for Distributors to choose the activities they will undertake similar to that of DCP008B.</p> <p>Both DCP008B and DCP008D offer flexibility of service.</p> <p>Does it improve the DCUSA objectives?</p>
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	<p>This question is the most difficult to answer. The industry consensus being that it did not improve the DCUSA objectives nor did it hinder them. It must be noted that it does have a significant impact on the interests of the Customer (DCUSA - 9.4.1) by providing a service should a metering fault be identified under some of the scenarios.</p> <p>ENW would argue that dependant upon the option chosen it could impact: <i>"the efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences"</i></p> <p>DCP008A will impact the SFIC service by having to determine who is a vulnerable Customer out of hours which may result in further time on the phone to the detriment of other distributor related calls.</p> <p>DCP008B will impact the same service by having to understand, and keep up to date, the Suppliers who wish to have UMetS together with having to tell some Customers that we can't go out but others that we can.</p> <p>Both of these two options having a potentially negative impact on this objective, whereas DCP008D (pass the call to their Supplier/Mop) will have a neutral impact.</p> <p>With regard to having a positive effect on the Customer it seems that DCP008A could have a negative impact since we have sent someone out to a no supply call and then we would walk away because it is a meter fault for a non vulnerable Customer. This may also be the case for DCP008B were in the first instance Distributors decide not to offer a service and in the second, where Distributors do offer a service, the Suppliers do not wish to take up such an offer and equally do not put anything else in its place.</p> <p>With regard to DCP008D, from the initial call the Customer will be told that it is the Supplier's responsibility to deal with metering faults and while on site the Customer will have a positive experience in that the meter will be exchanged and the Customer will be back on supply irrespective of Customer class. It is noted that the Suppliers will need to put something in place to deal with such out of hour's calls, but then it is their responsibility. If not then competition and differentiation of service will be the driver in that Customers will change Supplier</p>
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	<p>if they are not getting the service they desire. Alternatively the Authority may wish to consider appropriate licence obligations if the service is detrimental to the Customer.</p> <p>In summary,</p> <p>DCP008A – This proposal identifies the service but differentiates within the Domestic Customer Group thus allowing for a Distributor to ‘walk away’ when the capability to change the meter may be available. It also allows for a Distributor 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>DCP008B – It is difficult to assess this one since it is not clear under what scenarios a service will be provided (if anything) and equally the impact on the Customer should a Supplier not wish for such a service to be provided. This could be just legalising the status quo.</p> <p>DCP008D – 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 is passed to the Supplier who should be responsible for offering such a service. However, it is recognised that to visit site and walk away is not good customer service and as such UMeTS should be offered on a non discriminatory basis.</p> <p>In conclusion, our preferred option is DCP008D.</p> <p>.....</p> <p>Implementation date</p> <p>This depends on the solution being implemented.</p> <p>If DCP008A or DCP008D is accepted then we agree with the implementation date.</p> <p>If DCP008B is accepted then we believe that this could be implemented in November 2008. Where a Distributor is not ready, or decides not to offer such a service they opt out until they are ready to do so, thereby not impacting the</p>
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	implementation date.
Northern Electric Distribution Ltd	<p>We believe that the only acceptable option for the inclusion of UMetS within DCUSA is to make the provision voluntary rather than obligatory. This approach will support competition in the provision of metering services as championed by Ofgem and supported by removal of licence obligations on distributors relating to the provision of metering services back in April 2007.</p> <p>DCP 008B is the only proposal that supports competition in the provision of metering services.</p>
Scottish Hydro Electric Power Distribution plc	<p>The SSEPD companies reject all variation proposals on the grounds that:</p> <p>i) The DCUSA is not the right agreement for the proposed UMETS obligations ; and,</p> <p>ii) UMETS matters should be negotiated in bilateral commercial arrangements between distributors and suppliers.</p>
Southern Electric Power Distribution plc	Please see comments Scottish Hydro Electric Power Distribution plc
SP Distribution	None
SP Manweb	None
Western Power Distribution (South Wales) plc	None
Western Power Distribution (South West) plc	None
Yorkshire Electric Distribution Ltd	<p>We believe that the only acceptable option for the inclusion of UMetS within DCUSA is to make the provision voluntary rather than obligatory. This approach will support competition in the provision of metering services as championed by Ofgem and supported by removal of licence obligations on distributors relating to the provision of metering services back in April 2007.</p> <p>DCP 008B is the only proposal that supports competition in the provision of metering services.</p>

IDNOs	
<p>Independent Power Networks Limited</p>	<p>This change proposal highlights a very real issue in the electricity industry with regard to meters and metering responsibility. There has been a strong push within the industry to introduce competition in meter provision and metering service. This has resulted in a fragmented link at the key boundary of electricity provision to the end customer. Under the supplier hub principle suppliers have been given the responsibility for appointing the meter operator for the customer. However, when an electricity supply to a property fails it is the distributor who is contacted to resolve the fault regardless of where the fault occurs.</p> <p>End customers have no real understanding of the fundamental roles within the electricity industry and even less regarding the more subtle roles under the supplier hub principle. Our experience as an IDNO indicates that many in the industry do not understand these roles. We are increasingly finding when we attend off supply incidents on our networks which involve meters that neither the customer's supplier nor their meter operator will take responsibility and are attempting to inform the customer's supplier or the meter operator of the problem that they do not understand that they are still responsible under the supplier hub principle.</p> <p>Our current practice as we have no responsibility for meters would be to make the meter safe, usually through isolation of supply and to alert the supplier.</p> <p>We do not support this change proposal or either of the alternatives.</p> <p>We have already raised concerns regarding whether this issue should have been considered by DCUSA in earlier commentary to the process. We recognise that having been raised as an issue it was right for it to be discussed, but we still maintain our view that it is not within the vires of DCUSA to consider implementing a requirement which was previously removed from Distributors licences. The following comments are in addition to the earlier comments and deal specifically with each proposal.</p> <p>DCP008A proposes a basic minimum UMET service be provided by all distributors for a limited set of criteria. IPNL does not understand why distributors should be</p>

	<p>required to offer this service rather than suppliers who could just as easily put in place arrangements. Suppliers have contractual arrangements in place with Meter Operators which should include dealing with emergencies affecting their meters. Where a call coming through to a distributors call centre is identified as a meter fault the customer can be advised to contact their supplier (call centres can hold contact details) to deal with the problem. Many customers will of course go straight to the supplier in the first place.</p> <p>Where a meter fault has been identified during a site visit by the distributor, the supplier should respond to the distributor and organise their meter operator to attend the fault. Where the customer is vulnerable then the visit by the MO would be a priority visit.</p> <p>DCP008B proposes that the service is optional both for the distributors to provide the service and for the suppliers to take up the service. This seems a compromise of the worse type. All parties can support this proposal and yet never intend either to offer the service or take it up. IPNL fail to understand why if such a service is optional in both its provision and its use that there is any need to include it in a formal governance arrangement. We also question whether any distributor would want to set up a service which requires staff training, on-going accreditation and a stock of meters when there is no guarantee that suppliers will use the service. On a purely commercial base no company would countenance this.</p> <p>Additionally, the optionality of the service will cause customer confusion, and particularly so to the customers who have been identified as vulnerable and therefore in need of extra support from the industry. It will difficult for the industry to explain the different levels of service between suppliers and distributors.</p> <p>The proposal indicates that it supports competitive meter operators, surely there is an equal argument that not having it in the DCUSA still supports competitive provision of this service. If the service is needed and suppliers want it then Meter Operators will develop it.</p> <p>DCP008D This proposal is more logical in its approach and places the onus for</p>
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	<p>resolving a metering fault with the supplier except in those circumstances where the distributor did not identify that the fault was meter based until the site visit had occurred. At this point it is suggested that the distributor's engineer should regardless of the status of the customer undertake UMETS.</p> <p>We do have sympathy with this proposal. We have identified that an increasing number of call outs we attend are for faults beyond the meter where the supplier has required their meter operator to install an isolator. The meter is not at fault but the isolator has failed. Under these circumstances we will either replace the isolator or by-pass it, so that customers do not remain off supply. We do charge suppliers for this work, but leave them to arrange any follow up visit with their Meter Operator. We believe that this provides the correct service for the customer and meets our responsibility as a distributor to make the supply safe. However, we would not undertake a repair or replacement of the meter. We believe that suppliers should have in place arrangements with their meter operator for dealing promptly with meter faults reported to them by the distributor's engineers.</p>
The Electricity Network Company Ltd	<p>This response should be read along with our comments provided in response to the consultation. We do not believe that the working group has successfully addressed any of the issues raised in our earlier response.</p> <p>General Comments:</p> <p>Areas such as attendance to metering faults, revenue protection, are a hangover from the separation of metering away from distributors and the separation of the PES licences into distribution and supply licences. These issues have been rumbling around for 8 years (or more) without resolution. We recognise the importance of resolving these issues. However, this needs to be done in accordance with provision of the Electricity Act 1989, the electricity distribution and supply licences and in accordance the provisions of the DCUSA. Much work has been in developing the DCUSA; in many ways it sets a benchmark for other industry arrangements. It would be a sad day and a dangerous omen if the DCUSA was to receive roughshod treatment and changes mandated that were outside the scope of the licence and beyond the objectives the DCUSA.</p>

	<p>Failure to satisfy Objectives and out of scope of distribution licence:</p> <ul style="list-style-type: none"> ➤ DCUSA has been developed pursuant to licence Condition 9, and as its title suggests is an agreement for connection and use of system. The obligation to offer such terms is prescribed in licence condition 12 (revised licence). Metering is fitted beyond the distribution system boundary and therefore falls out of scope of this licence condition. ➤ The only obligations that exist in respect of metering are those covered by section B of the revised licence. Section B only relates to DNOs and legacy metering systems. Section B does not apply to IDNOs ➤ It is of paramount importance that any change to the DCUSA is demonstrated as better facilitating the achievement of the objectives as specified in licence condition 22. The working group has not been able to do this. If the test for a DCUSA proposal to proceed is significantly weakened so that it only has to demonstrate a neutral impact on better facilitation of the objectives, then a dangerous precedent is set for future changes. ➤ We contend that the proposal has a negative impact on the facilitation of the objectives. A mandated obligation to provide Umets will result in additional costs and will compromise the obligation on the distributor to efficiently discharge their obligations. ➤ We recognise that under Section 3a of the Act the Authority has wider duties than better facilitating the objectives of the Act. However, if the Authority wishes to mandate that distributors should provide Umets then it should do so by first introducing a licence condition to such effect. ➤ We believe it is ultra vires Ofgem's powers to mandate a distributor provide services for which there is no licence provision. Given that there is no licence provision it will be beyond Ofgem's powers to determine on any charges (unless Ofgem chooses to use its concurrent powers under the Competition Act; however, it may be difficult to assert that in the current market an IDNO is dominant).
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	<p>Comment on proposed drafting:</p> <ul style="list-style-type: none"> ➤ In each of the options clause 29A.14 provides a very high level of indemnity for distributors. It is surprising that suppliers are willing to accept such an open ended liability without any route to dispute. ➤ Given that option B places no obligation on a distributor to provide such services we believe this option is the “least worst” of the options proposed. However, we have voted to reject because under the current governance arrangements Umets has no place in DCUSA. <p>We note that it is proposed that DCUSA be a designated document. However this is yet to happen (in Autumn?). Therefore in the absence of being able to appeal a change directed by Ofgem (but not supported by a constituency) what is the appeals mechanism?</p> <p>Is it a judicial review?</p> <p>In submitting the recommendation to Ofgem can the panel ask Ofgem for the position in respect of this?</p>
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Suppliers

<p>British Gas</p>	<p>We have reviewed again the variations against the DCUSA objectives and on balance do not believe that any of the alternatives better facilitate the objectives.</p> <p>We have also reviewed the proposals from a wider customer service perspective and as stated in previous responses would like to point out that British Gas has an out of hours capability for prepayment customers for both call handling and meter operation services. We believe that the majority of UMETS services would be provided to prepayment customers. Therefore our requirement for this service is minimal.</p> <p>The main criteria when procuring a UMETS service would be as follows:</p> <ol style="list-style-type: none"> 1. We would require a like for like meter exchange service
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	<p>2. We would prefer a consistent service across the country</p> <p>3. We require the ability to opt out of the service depending on the price and service offered by the DNO</p> <p>None of the 3 alternatives put forward meet all of the above criteria.</p> <p>We would also like to point out that no agreement has been made as to how a UMETS service would be funded. We have had no visibility of likely charges for those DNOs that currently do not offer a UMETS service. We therefore do not feel comfortable to vote to accept a service where we have an unknown exposure to costs. In addition we would strongly object to any element of the UMETS service being funded from general Use of System charges as this would build in an unacceptable cross subsidy and also penalise those suppliers who have procured their own out of hours metering capability.</p>
EDF Energy Customers	<p>We consider that DCP 008A achieves an acceptable balance between the requirements of Suppliers and the obligations of Distributors while providing a uniform standard of response to Urgent Metering Services incidents for consumers.</p> <p>DCP 008B could, and almost certainly will, lead to different services in different areas, in effect a postcode lottery for Urgent Metering Services.</p> <p>DCP 008D provides a similar service to DCP 008A and would be an acceptable alternative as second choice.</p>
E.ON UK Group	<p>If Ofgem believe that the first person to attend a customer should provide a UMETS service, then the Distributor must have the responsibility for providing the service. We believe that none of the variations are preferable to the variation c that was rejected by the working group and panel. We have therefore tried to raise this alternate as a separate DCP which was rejected by the panel. We would still urge Ofgem to consider this variant alongside the other three.</p>
RWE Npower Group	<p>As stated within our Consultation Response, npower's preference is for Option C,</p>

	<p>which is the Option that we believe provides the most satisfactory UMeTS provision for the end customer. Given that Option C is not included as an Option within this Change Report we are therefore rejecting all three variations (A,B and D) as we do not believe that any of these variations will provide the most satisfactory UMeTS provision for the end customer.</p> <p>We note from reviewing the DCUSA Panel Agenda and Papers that a new DCUSA CP (DCP26) has been raised by Eon, which is proposing the progression of Option C, of which npower are supportive.</p> <p>We would like to state that we have some concerns with the selection process that was followed for the selection of the 3 variations for progression, and do not believe that this process led to the most representative selection of Options for progression within the Change Report.</p> <p>Question 8 within the DCP08 Consultation asked respondents to state whether they felt that one or more of the Alternatives proposed by the individual Working Group members better facilitates the DCUSA Objectives and/or provides a better UMeTS service compared to the Working Group’s proposal (DCP08A), and if so, to rank DCP08A-D in order with reasons.</p> <p>Of the 19 respondents to this question within the DCP08 consultation, only 9 of the respondents ranked the variations in order of preference, whilst the remainder either indicated their 1st choice only or indicated that they had no preference/support for any option. Where respondents had indicated an order of preference this was taken into account by the Working Group/Panel, however where no such order of preference was provided clearly only the respondent’s 1st choice was taken into account. This mixed “Scoring” mechanism lead to the selection of Options B, D and A for inclusion within the Change Report. If all responses had been treated equally however ie only a respondents first choice had been taken into consideration, then Option B, C and D would have been selected for inclusion in the Change Report, which we believe would have been a more representative option selection given the responses submitted.</p>
<p>ScottishPower Energy Retail Ltd</p>	<p>ScottishPower Energy Retail fully support the concept of a UMETS service</p>

	<p>provided by the DNO. In our view it is the best way to minimise disruption to consumers and get them back on supply in the shortest possible time.</p> <p>We have taken the decision to reject all of the proposed variations as we do not believe any of them offer the customer the best level of protection.</p> <p>Our preferred option DCP008C was removed at the last stage of consultation and in our view all variations should have been put forward for voting.</p> <p>DCP008C has been raised as a new CP and has been submitted Panel. It is our intention to fully support this new proposal.</p>
SSE Energy Supply Limited	<p>We do not believe that the DCUSA is the appropriate forum for imposing an obligation for the provision of Urgent Metering Services. This should be covered by commercial agreements between distributors and suppliers.</p>