Question 1: Does the proposed variation and alternative variations better facilitate the DCUSA Objectives? Please state which objective(s) and give supporting comments.	
British Gas	3.1.2 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; We believe that the only objective that is relevant to the UMeTS service is 3.1.2 above. The provision and maintenance of metering equipment is a supplier obligation. Suppliers should have the ability to determine who is able to work on its' metering equipment and what types of metering technology are installed on its' customer premises. We believe that the alternatives DCP008A, C and D give the option for the distributor to fit any type of metering equipment in our customers properties and therefore we do not believe that they meet the above objective. DCP 008B is the only alternative as presently drafted that meets the above objective.
CE ELECTRIC UK	DCP 008A, DCP 008C and DCP 008D Variations purport to better facilitate objectives (i) *"The development ,maintenance and operation of efficient co-ordinated and economical networks"* and (iii) *"The efficient discharge by distributors of obligations imposed upon them by their licence"*. We believe that these variations are no better or worse than the existing DCUSA provisions in facilitating (i) and (iii). We also believe that these proposals are worse than the existing DCUSA against objective (ii), *"The facilitation of effective competition in the generation and supply of electricity and the promotion of such competition in the sale, distribution and purchase of electricity"*, as they place an obligation on distributors to provide metering services rather than promoting competition in the provision of metering services. As such, these variations would be completely at odds with the action taken by Ofgem last year in recognising the existence of a competitive market in metering services and removing from the distribution licence all MAP and MOP obligations other than legacy basic meter asset provision. DCP 008B Variation 008B purports to better facilitate objectives (i), (ii), and (iii). We believe that this variation is no better or worse than proposals 008A, 008C and 008D in facilitating (i) and (iii). This variation better facilitates (ii) as it promotes competition in the provision of metering services and, as such, accords with the aforementioned action taken by Ofgem last year.
Central Networks	Central Networks do not believe that the proposal or variations better facilitate the four DCUSA objectives set out below for the

	following reasons: 1.1 The provision of UMetS does not further the development, maintenance and operation by DNOs and Independent Distribution Network Operators (IDNOs) of an efficient, coordinated and economical distribution network. Metering is a function of the supplier, in accordance with the supplier hub principle. In order to facilitate this, suppliers have in place contracts with their agents for the provision of such services. IDNOs have never provided metering services, and to now position themselves to carry out such an obligation would undoubtedly create a huge barrier to entry into such a market, prohibitive to other prospective IDNOs considering entering such a market. 1.2 Central Networks do not believe that UMetS plays any part in facilitating effective competition in the generation and supply of electricity (so far as is consistent therewith), or the promotion of such competition in the sale, distribution and purchase of electricity. UMetS is a service to ensure that the electricity supply is restored as quickly as possible, and is a service that is proposed to be provided by the DNO, although metering is a supplier function, not a DNO function. It is conceivable that UMetS could be offered by third parties on a competitive basis, however this could only operate on a two-visit basis if the suppliers were mandated in such a way. As highlighted above, where DNOs have divested themselves of these activities, any requirement back on DNOs would either require two visits or a retraining and reskilling of DNO resource at an equivalent cost. 1.3 There is no longer any metering obligation upon DNO and IDNO Parties in their Distribution Licences. 1.4 Central Networks does not believe that the provision of UMetS assists in any way in the promotion of efficiency in the implementation and administration of this agreement. It is merely an ancillary metering service.
E.ON UK	No. We do not believe any of the DCUSA objectives are met by any of the options.
EDF Energy Customers plc	UMetS was not considered as part of the original DCUSA. However, we believe that DCUSA is the most appropriate place to clarify and define the obligations on Suppliers and Distributors for Urgent Metering Services. The proposed variation and alternative variations do not impede the DCUSA Objectives and we agree that it does slightly better facilitate two of the Objectives as detailed in DCP 008A: "The development, maintenance and operation of efficient co-ordinated and economical networks" is improved by maintaining and protecting the network from further potential damage whilst also helping vulnerable customers connected to it. "The efficient discharge by distributors of the obligations imposed upon them by their licence" is improved by

	providing further clarity on the activities undertaken by the Supply Fault Information Centre when calls are received from Customers.
EDF Energy Networks	The proposal is neutral to the objectives but within the scope of DCUSA.
Electricity North West Limited	In general there is no material improvement against each of the DCUSA objectives. However "The efficient discharge by distributors of the obligations imposed upon them by their licence" is improved by providing further clarity on the activities undertaken by the Supply Fault Information Centre (SLC6) when calls are received from Customers by identifying within three of the change proposals what service will be provided and what the Customer can expect and hopefully within the fourth this would be made clear within the Relevant Charging Statement. 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.
energywatch	energywatch does not believe that the variation or that the alternatives better facilitate the DCUSA objectives nor do we believe they hinder them. It is appropriate however that the issue of consumer detriment arising from the current provisions is aired.
ESP Electricity Ltd	ESP does not believe that any of the four DCUSA objectives are better facilitated through the proposed variations. This is predominantly due to the fact that UMETS is not an obligation of the electricity distribution licence. Also Licence Condition 36 is not currently 'switched on' for IDNOs.
IPNL	The Working Group in its own words states 'the original Proposal as developed by the Group and the Alternatives do not materially improve the achievement of the DCUSA Objectives, but they do not hinder them.' It is clear therefore that none of the proposals better facilitate the DCUSA Objectives. It can not be acceptable to adopt a proposal merely because it does not hinder defined objectives of an industry agreement. 1. the development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks; The provision of metering and metering services has been competitive for some time and under the supplier hub principle it is the supplier who has responsibility for nominating and appointing the Meter Operator. Distributors have not been obliged to provide metering services since 1 April 2007 and IDNOs were never subject to this requirement. The adoption of DCP 008 would therefore impose an entirely new burden on IDNOs, and to restore an obligation on DNOs which the Authority deliberately removed from their licences. This would bring with it a requirement for distributors to command resources they no longer have and to bear the costs associated with such resources. This would be contrary to the above DCSUA Objective. In addition, it would be contrary to the principles of Better Regulation.

	2. 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; The provision of metering and metering services has been competitive for some time and under the supplier hub principle it is the supplier who has responsibility for nominating and appointing the Meter Operator. As mentioned above the requirement for distributors to provide metering services under their licences was removed last year by the Authority. It can not be consistent with this objective which requires the change to facilitate effective competition to shift a service from a competitive market back to a regulated environment. DCUSA Consultation DCP 008 31 March 2008 Page 2 of 4 v1.0 3. the efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences; and The fact that the requirement on DNOs to provide metering services was removed from distribution licences in April 2007 makes it clear that this proposal does not support the efficient discharge by DNOs and IDNOs of their licence obligations. 4. the promotion of efficiency in the implementation and administration of this Agreement. The proposal has no impact on the implementation or administration of the Agreement.
Npower Group	Whilst we do not believe that any of the proposed variations better facilitates the DCUSA Objectives, we do believe that incorporation of clauses relating to the provision of Urgent Metering Services into the DCUSA will be of benefit to the end customer, and their inclusion within DCUSA is therefore consistent with wider obligations to Customers.
Scottish Power Energy Retail Limited	Yes “The development, maintenance and operation of efficient co-ordinated and economical networks” Protects the network from potential additional damage and assist vulnerable and other customers.
SP Distribution / SP Manweb	Yes. The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient co-ordinated and economical Distribution Networks.
SSE Energy Supply Limited	We do not believe that the DCUSA is the most appropriate forum for imposing an obligation for the provision of Urgent Metering Services. There are existing commercial agreements that work well. If considered necessary, an amendment to the Distribution Licence would be a more appropriate means of imposing these requirements. With this in mind, we are not sure that the proposed variation does actually better facilitate the DCUSA objectives.

SSEPD	We are of the opinion that DCUSA is not the appropriate agreement for UMeTS obligations on DNO, as the provision of UMeTS by DNO's is not a Licence obligation. We feel that the industry parties should agree suitable commercial arrangements on a bilateral basis as necessary. Accordingly, we do not consider that any of the DCUSA objectives are relevant or applicable to UMeTS.
The Electricity Network Company ltd	**Objective 1** is to better facilitate achievement of the *"development, maintenance and operation by the licensee of an efficient, coordinated and economical distribution system".* Under the distribution licence, and therefore as far as DCUSA is concerned, Distribution system is defined as *"…the system consisting (wholly or mainly) of electric lines owned or operated by an authorised distributor and used for the distribution of electricity from grid supply points or generation sets or other entry points to the points of delivery to customers or authorised electricity operators or any transmission licensee within Great Britain in its capacity as operator of the licensee's transmission system or the GB transmission system, and includes any remote transmission assets (owned by a transmission licensee within England and Wales) operated by such distributor and any electrical plant, meters and metering equipment owned or operated by such distributor in connection with the distribution of electricity, but does not include any part of the GB transmission system."* It is important to recognise that metering is only defined as being part of the distribution system where it is **owned or operated** by the distributor. Where the distributor neither owns nor operates the metering (i.e. it is neither the MAP or MOP), the metering does not form part of the distribution system. Therefore, given that the metering does not form part of the distribution system, the provision of UMets **does not** better facilitate this objective. **Given that the proposal deals covers services that relate to assets that do not form part of the distribution system, it does not better facilitate the achievement of Objective 1** **Objective 2** is the "*the facilitation of effective competition in the generation and supply of electricity and (so far as consistent therewith) the promotion of such competition in the sale, distribution and purchase of electricity."* 1. The consultation has failed to identify how the change proposal satisfies this objective. Competition in metering is developed. Distributors (with a distribution services area obligation) are obligated only to offer metering services in respect of legacy metering. If a 24/7 metering service is required then the responsibility for providing such service must lie with suppliers and in the contracts they establish with accredited meter operators and meter asset providers. **Given that competition in metering is developed and that suppliers can choose who to appoint as MAP and MOP the proposal does not facilitate (nor does it promote) competition**

	in supply. **Objective 3** is to better facilitate achievement of the *"…efficient discharge by the licensee of the obligations imposed upon it by this licence"* There are no licence obligations on distributors to offer such services. Licence Condition 4D only requires the distributor to offer to enter into arrangements for use of system (the licence defines use of system as "…use of the licensee's distribution system for the distribution of electricity by the licensee on behalf of any person"). Licence Condition 36 only applies to distributors with a distribution services area direction and then only in respect of legacy metering. **Given that the provision of such services is not a licence obligation Objective 3 is not met.** **Objective 4** is to better facilitate achievement of *"…the promotion of efficiency in the implementation and administration of the DCUSA arrangements."* The provision of metering is outside the DCUSA arrangements and outside the scope of the DCUSA as described in Part B of Licence Condition 9B. Although paragraph 6(d) of Part B makes provision for the installation and maintenance of metering equipment we believe that this relates to Clause 29 of the DCUSA and covers arrangements that were in place in the original DUoSA. Part E of the Licence conditions makes provision for the amendments to the DCUSA. To use paragraph 6(d) of Part B to justify the change would be tenuous and disingenuous. Notwithstanding the specific objectives described in Licence Condition 9B, the principal objective of the DCUSA is to provide the governance arrangements for the use of a distribution system. Under distribution licences metering only forms part of the distribution system where it is owned or operated by the distributor. **Objective 4 is not met.** **Additional Comment** Licence Condition 9B of the Distribution Licence, (more specifically paragraph 12(c)) requires that achievement of the Applicable DCUSA objectives is properly achieved. We do not agree with the proposer's interpretation of how the objectives of DCUSA are satisfied. The ESQCR regulations make it absolutely clear about actions to be taken where there is a risk of danger or damage. In the circumstances prescribed the situation can be made safe and damage prevented by the removal of the

	fuse. We do not see how this agreement provides further clarity of the activities undertaken by SFIC. Licence Condition 6 of the distribution licence already does this and in particular relates the activities to the operation of the distribution system. This change proposal seeks to expand the scope of activities of SFIC beyond those described in the distribution licence. The working group in its consultation has failed to identify which of the DCUSA objectives is satisfied and provide any rationale why this is so. The assertion that the proposal does not conflict with Licence obligations is insufficient in itself to demonstrate that the proposal better facilitates the objectives. However, the proposal does conflict with the provisions of the Licence and of the Electricity Act. The provision of UMets is an unlicensed (there are no licence conditions that cover this) and unregulated activity. Therefore, the provision of such services are outside the governance of Ofgem. We therefore are of the view that Ofgem would be abusing its powers to require a distributor to provide a service which is outside the scope of the licence. This is what Ofgem would be doing if it directed that such change be made without a prior licence change. **We do not believe that Umets should form part of the DCUSA without a change in licence obligations.**
Western Power Distribution (South West) plc and Western Power Distribution (South West) plc.	We do not believe that either the proposal as developed by the Working Group or any of the alternatives better facilitate any of the DCUSA objectives: • 3.1.1 This is about development and maintenance of the Distribution Network. Metering equipment is not part of the Distribution Network so there can be no impact. • 3.1.2 We do not believe this proposal will have any material impact on competition in generation or supply • 3.1.3 This relates to the efficient discharge of our licence obligations. The provision of UMETS services is not a licence obligation and changes to the DCUSA should not impose obligations on DNOs to carry out work on equipment that is clearly not part of the distribution network. It is also important that this change does not create any precedents to broaden the scope of the DCUSA. • 3.1.4 We do not believe this proposal will have any material impact on the implementation or administration of the DCUSA.