

Company	Confidential/ Anonymous	Do you understand the intent of DCP 364?	Working Group comments
British Gas	Non-confidential	Yes	Noted
Electricity North West	Non-confidential	We do understand the intent of DCP 364.	Noted
ENGIE Power Limited	Non-confidential	Yes.	Noted
Leep Electricity Networks Ltd	Non-confidential	Yes, and are supportive of the proposal to create a central location to detail supplier parties emergency service contact details and operational hours in order to better support consumers.	Noted
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Non-confidential	Yes	Noted
Npower	Non-confidential	Yes	Noted
SSE Energy Supply Ltd	Non-confidential	Yes.	Noted
Western Power Distribution	Non-confidential	Yes.	Noted

**Working Group Conclusions:**

All respondents stated that they understood the intent of DCP 364.

Company	Confidential/ Anonymous	Do you believe that the request for information detailed in 4.5 and 4.6 above is sufficient to understand Suppliers current operating hours for emergency metering service provisions? If not, please provide suggestions for improvement.	Working Group comments
British Gas	Non-confidential	Assume this is for DNO to respond to?	Noted
Electricity North West	Non-confidential	We believe the request for information to be sufficient.	Noted
ENGIE Power Limited	Non-confidential	Yes.	Noted
Leep Electricity Networks Ltd	Non-confidential	Yes	Noted
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Non-confidential	Yes	Noted

Npower	Non-confidential	Is any clarification needed to reflect that there may be different arrangements for different customer types ie domestic, small business or I&C? Certainly, different arrangements may be in place for I&C customers, as they often have their own bespoke meter operation arrangements. Is the intention here to cover all types of customer, or just domestic and small business?	The intention is to capture all customer types and therefore it will be made clear that if the arrangements are different for certain customer types this should be indicated on a separate line, similar to as would be required if details are different per licence area. We will ensure appropriate guidance is within the proposed spreadsheet.
SSE Energy Supply Ltd	Non-confidential	We agree that the information requested for supplier contact facilities in sections A – E are sufficient to understand Suppliers current operating hours and emergency metering service provisions. However, we are not clear as to the benefit of suppliers providing section F 'On Site Meter Response', please can this be clarified? There are multiple MOPs within each distribution area who may service specific sites rather than on an area by area basis, and as such contracts may cross over multiple distribution areas. The list of MOPs could be extensive with no way of the DNO knowing which MOP is correct for a particular site, without first contacting the supplier (which they would do with the information from sections A-E). If a section on meter operator operating hours is required, could this not be a standalone register of all MOP info (not requiring to link the MOPs to specific suppliers)? Another concern is that making a list of MOPs who each supplier contracts with could have implications for commercial sensitivity and competition between parties - if all parties with access to DCUSA website login can see this information then it reveals all of a supplier's chosen MOP contracts,	It should be noted that column F is only asking for the time of operation for meter operators and not the names of the contracted MOPs.

		which a supplier may not want to be visible to all parties.	
Western Power Distribution	Non-confidential	Yes, the details required are sufficient, though DB's and GDN's also require accurate contact details during office hours if they need to highlight or report an issue. Is 'emergency metering' the correct title as any metering service provisions would be necessary to make an improvement.	This CP is specifically designed to address the issue regarding visibility of Supplier emergency metering provisions. The Working Group acknowledges the comment and noted that maybe in the future a more comprehensive register could be created to include all metering service provisions and consider merging any existing registers to make locating such data as easy as possible.
<p><b>Working Group Conclusions:</b></p> <p>All respondents stated they believed the requested information was sufficient to understand Suppliers current operating hours for emergency metering service provisions. One Party was concerned about the information being requested in column F regarding MOP onsite meter response. It should be noted that column F is only asking for the time of operation for meter operators and not the names of the contracted MOPs. After reviewing it was agreed to change the name of this column from "On-Site Meter Operator Response" to "On-Site Operational Response". The Working Group also acknowledged the comment regarding expanding the scope of the register to all metering service provisions but at this stage believe it is appropriate to address the specific issue of visibility of Supplier emergency service provisions. Consideration of a more comprehensive register to include all metering service provisions and merging any existing registers to make locating such data as easy as possible, may be appropriate in the future.</p>			

Company	Confidential/ Anonymous	<p><b>Do you consider that DCP 364 better facilitates the DCUSA General Objectives?</b></p> <p><b>If so, please detail which of the General Objectives you believe are better facilitated and provide supporting reasons.</b></p> <p><b>If not, please provide supporting reasons.</b></p>	Working Group comments

British Gas	Non-confidential	We are supportive of initiatives that improve the customer experience and the introduction of a centralised register of Suppliers metering service provision will assist in this.	Noted
Electricity North West	Non-confidential	We believe this change will better facilitate General Objective four as it will improve communication between Distribution Businesses and Suppliers and the customer's experience when faced with an emergency metering issue.	Noted
ENGIE Power Limited	Non-confidential	Yes.  4 The promotion of efficiency in the implementation and administration of the DCUSA.  Sharing contact information for emergencies in a central location will streamline the electricity emergency process, make sure the right contacts are being used, and ensure the right points of escalation are utilised where necessary.	Noted
Leep Electricity Networks Ltd	Non-confidential	We agree that objectives 1 and 3 (as detailed below) would be better facilitated by this change proposal by driving efficiencies in restoring supply where Supplier Parties need to be contacted:  The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks	Noted

		The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences	
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Non-confidential	Yes. We agree that this change proposal supports the general objectives 1, 3 and 4	Noted
Npower	Non-confidential	Yes, General Objectives 1, 3 and 4, as this will improve the DNOs ability to communicate with suppliers and customers when there are metering issues at a customer's premises.	Noted
SSE Energy Supply Ltd	Non-confidential	We agree that the change positively impacts DCUSA general objectives 1, 3 and 4.	Noted
Western Power Distribution	Non-confidential	Yes, as detailed in the proposal it will improve communications and better facilitate general objectives one, three and four. Mandating suppliers to provide and keep up to date contact details is important to provide fluid customer services to all parties.	Noted

**Working Group Conclusions:**

All respondents consider that DCP 364 better facilitates the DCUSA General Objectives.

Company	Confidential/ Anonymous	Are you aware of any relevant Code Review or Other Code Changes which may be impacted by the development of this Change Proposal?	Working Group comments
British Gas	Non-confidential	No	Noted
Electricity North West	Non-confidential	We are not aware of any current reviews or code changes that could impact DCP 364.	Noted
ENGIE Power Limited	Non-confidential	No.	Noted
Leep Electricity Networks Ltd	Non-confidential	No	Noted
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Non-confidential	No	Noted
Npower	Non-confidential	No	Noted

SSE Energy Supply Ltd	Non-confidential	No	Noted
Western Power Distribution	Non-confidential	No	Noted
<b>Working Group Conclusions:</b>  None of the respondents were aware of any relevant Code Review or Other Code Changes which may be impacted by the development of this Change Proposal.			

Company	Confidential/ Anonymous	Are you supportive of the proposed implementation date of the next scheduled DCUSA release following approval?	Working Group comments
British Gas	Non-confidential	Yes	Noted
Electricity North West	Non-confidential	We are supportive of the proposed implementation approach.	Noted
ENGIE Power Limited	Non-confidential	Yes.	Noted
Leep Electricity Networks Ltd	Non-confidential	Yes	Noted
Northern Powergrid on behalf of Northern Powergrid	Non-confidential	Yes	Noted



(Northeast) Ltd and Northern Powergrid (Yorkshire) plc			
Npower	Non-confidential	Yes	Noted
SSE Energy Supply Ltd	Non-confidential	Yes, though this would be dependent on the final version of the register/ the inclusion of section F. Assuming that following this consultation the sections of the register could be amended, suppliers could require more time to prepare for implementation.	Noted – please note the Working Response to question 2 above.
Western Power Distribution	Non-confidential	Yes	Noted
<b>Working Group Conclusions:</b>  All respondents were supportive of the proposed implementation date of the next scheduled DCUSA release following approval.			

Company	Confidential/ Anonymous	Do you have any comments/ suggested amendments on the proposed legal text for DCP 364?	Working Group comments
British Gas	Non-confidential	No	Noted
Electricity North West	Non-confidential	The legal text will deliver the intent of this change and ensures that the new register is kept up to date.	Noted
ENGIE Power Limited	Non-confidential	No.	Noted

Leep Electricity Networks Ltd	Non-confidential	No	Noted
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Non-confidential	<p>The insertion of the new clause into section 2A and the new paragraph into schedule 14 need to be more precise as to where in the respective section and schedule are to be inserted. The consultation DCUSA text proposal is too vague as it stands. Suggest including a new 30.19 clause – possibly with a sub-title.</p> <p>We appreciate that DCUSA's legal advisors will be consulted for the final wording of text to be added to DCUSA and that the legal text is not complete at the moment, but would suggest the following are considered:</p> <ul style="list-style-type: none"> <li>a) Careful use of Supplier (Party) v User for consistency;</li> <li>b) Careful use of will v shall for consistency;</li> <li>c) The two new paragraphs duplicate large parts of the same or similar text;</li> <li>d) Last sentence of Schedule 14 amendments - The Secretariat <del>shall will</del> publish and maintain a <del>list of these points of contact consolidated</del> <b>Supplier Emergency Metering Provisions register</b>, located in the member's only section of the DCUSA website.</li> </ul>	<p>The final Change Report will detail the precise location of the proposed legal text within DCUSA. The suggested legal text considerations have been noted and will be considered before finalising the legal text and issuing to legal advisors for review.</p> <p>The suggested location of the legal text that was on the first page of the consultation will be removed from future versions.</p>

		<p>e) There is an existing paragraph for similar requirements (30.13A) so this could be used as a template?</p> <p>The headline page of the consultation document states the impacted clauses of DCUSA are "Introduction of new Clause 30.5E.1A to be added under Clause 30.5 of Section 2A, and a new Clause 3A(e) be added to Schedule 14". I believe the working group determined that a clause 30.5E.1A is not the appropriate place for this amendment and I suspect this section has not been amended following the change proposal draft.</p> <p>Please clarify precisely where the changes to the DCUSA text will occur and reflect this in the headline page of the consultation document.</p>	
Npower	Non-confidential	No	Noted
SSE Energy Supply Ltd	Non-confidential	No	Noted
Western Power Distribution	Non-confidential	As detailed in a response to Richard at DCUSA, the proposed table to be completed by parties needs consistent wording and names for all DB parties, and all networks need to be available to select in the drop-down boxes. Adding the area prefix code (first two digits) from MPAN's along with denoted network areas would be beneficial to supplier parties.	This comment has been addressed and will be reflected in the final version of the register.
<b>Working Group Conclusions:</b>			

The Working Group note the comments regarding the legal text, and these will be considered prior to finalising the DCP 364 legal text and submitting to legal advisors for review.

Company	Confidential/ Anonymous	Do you have any other comments?	Working Group comments
British Gas	Non-confidential	<p>The consultation states:</p> <p>“Work has been underway under the auspices of the ENA to develop best practice protocols for managing emergency incidents, for example where customers have their metering equipment isolated for safety. There is currently no register of metering services cover provided by Suppliers which often have very different hours and modes of operation for both the customer call centres and the emergency response services. This can often leave customers off supply without a clear follow up expectation.”</p> <p>It would be good to understand the materiality of the issue and the numbers of customers that are being left off supply so that Suppliers can ensure appropriate resources are in place to deal with these enquiries if necessary. From a British Gas perspective, we are not aware that our customers are being left off supply due to a lack of emergency metering provision.</p>	<p>The Working Group acknowledges this comment and details of the number of Supplier related jobs attended by UKPN staff will be provided. It was agreed that a sample of three licence areas will be sufficient to justify the need for this CP. This analysis will be provided within the Change Report.</p>
Electricity North West	Non-confidential	<p>This change proposal is welcomed as it is directly linked to Ofgem’s 2018 open letter on emergency metering services and will provide up to date contact information to the industry for the resolution of metering issues. Additionally, the customers</p>	Noted

		experience should improve including being better informed of the steps to be taken to resolve a metering issue. Notifying amendments within 10 working days is also a good step along with annual confirmation.	
ENGIE Power Limited	Non-confidential	N/A	N/A
Leep Electricity Networks Ltd	Non-confidential	No	Noted
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Non-confidential	No	Noted
Npower	Non-confidential	No	Noted
SSE Energy Supply Ltd	Non-confidential	As per our answer to Q2 above, we request clarity on the requirement for suppliers to provide MOP details in section F of the register, and for our related concerns to be addressed.	Noted – please note the Working Response to question 2 above.
Western Power Distribution	Non-confidential	No	Noted
<b>Working Group Conclusions:</b>			

The Working Group acknowledges the comment regarding understanding the materiality of the issues described in this CP and details of the number of Supplier related jobs attended by UKPN staff will be provided. It was agreed that a sample of three licence areas will be sufficient to justify the need for this CP. This analysis will be provided within the Change Report.