DCP 349 'Effectiveness of the current provision of unsecured cover under Schedule 1' COLLATED CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS

Company	Confidential/ Anonymous	1. Suppliers: What service do you offer customers in terms of lead times to move meters – are there any exceptions? Is this currently a chargeable service or free?	Working Group Comments
EDF	Confidential	A cosmetic re-site for a meter move is chargeable work – additional costs required for extra materials such as cable tray, isolators etc. Lead time varies but exceptions are made.	
WPD	Non-confidential	N/A	
NPg	Non-confidential	N/A	
UKPN	Non-confidential	N/A	
ENWL	Non-confidential	As a Distributor we do not offer a service to move meters. However, the electricity meter normally requires re-locating as part of a customer-requested service alteration. Service alterations are a chargeable service with indicative costs published in our relevant charging statement.	
SPEN	Non-confidential	N/A	
British Gas	Non-confidential	Lead times tend to be 7 days, however depending on availability or vulnerability, jobs can be carried out the same day. Our engineers will move an internal metre up to a distance of 1 meter as long as it is on the same wall and this is usually free of charge. There is	

		also guidance on free of charge re-positions for vulnerable customers if they are unable to access their meter. We do not move external meters – these are referred to the DNO	
ScottishPower Energy Retail Ltd	Non-confidential	We offer a range of services. We are not prepared to share charging arrangements	
SSE Energy Supply Limited	Non-confidential	Lead times for meter moves vary. This is because the appointment scheduling is dependent on both the customer's own requirements and on the capacity of our Meter Operator agents. For NHH and HH meter moves requested by a customer we may make a charge however the amount is not fixed – it is dependent on what work is required. However, we also use our discretion as to whether to waive any fee for meter moves on a case by case basis.	
Octopus Energy	Non-confidential	Very limited number of these undertaken and are currently FOC. Lead times are subject to the customer's request and circumstance	
Opus Energy Ltd & Haven Power Ltd	Non-confidential	The typical lead times that we have as a Supplier for arranging to move a meter at a customer's request is around 4-6 weeks, for an engaged customer. Timescales can vary by job, levels of customer engagement and by Meter Operator. A key issue is where customers notify us at short notice of such a request. This is a chargeable service.	

Utilita Energy LTD	Non-confidential	We do not charge for domestic service alteration. We will do our best to arrange for an engineer to be at the property at the time the customer has arranged with the distributor (depending on engineer availability etc).	
SSEN	Non-confidential	N/A	
Working Group Conclusions:			

Company	Confidential/ Anonymous	2. If this CP was approved and Distributors were able to move meters during service alterations, how should the customer journey look? Are there any concerns that require mitigation?	Working Group Comments
EDF	Confidential	Customer journey should be seamless, with little or no contact required? Main Concerns: Do DB's have to inform MEM's via a "D" flow where is the new location i.e. maximum height 6ft etc, is the SMETS WAN HAN IHD still working etc Will DB put onus on customer to contact supplier or will this be done by DB? DB to check before service/SMET's is relocated, a signal is currently being received and is still able to be received at the new location.	
WPD	Non-confidential	With metering equipment being under the ownership and responsibility of the energy supplier for the associated MPAN the customer should liaise with their supplier to arrange the work in the first instance.	

		If the DB does not want to engage in moving the meter the supplier will need to attend on an agreeable date and complete the work. If the DB wants to undertake the meter move they will need to notify the supplier that they are undertaking the work and all liabilities will then fall on the DB unless otherwise agreed.	
NPg	Non-confidential	Ideally the change would need all suppliers to agree to the Distributor moving the meter to make the overall process much easier to follow. It is much more efficient for a single process to be followed rather than different ones for different suppliers. The supplier (via their meter operator) is responsible for the metering work of a service alteration. If the Distributor carried out this work it would be a substantive change to the current position. This introduces a significant liability risk to the Distributor which may render the CP unsupportable.	
UKPN	Non-confidential	We have attached a view of the suggested process for consideration. With this change, where DNOs have the facility – the customer journey can have additional choice that can allow a simpler one stop shop for the service alteration, whereby the DNO can give advice on the benefits of the getting the supplier to fit a smart meter and improved communication from the DNO survey in respect of the smart communications issues that can arise from service alterations.	
ENWL	Non-confidential	The customer journey should improve where a Distributor can move a meter when carrying out a service alteration as it would essentially be offering the customer a 'one stop shop'. Communications between the parties involved is essential to ensure each is kept up to date on progress.	

		The process should ensure that the customer remains on-supply after a service alteration and does not need to wait for the Supplier to attend and relocate the electricity meter: • Distributor informs the customer of the proposed service alteration completion date and advises the customer to contact their Supplier (both electricity and gas) • Distributor attends site and completes the service alteration, including relocating the electricity meter • Distributor confirms to the customer that the meter has been relocated • Customer informs the electricity/gas supplier that the electricity meter has been relocated and that they should check communications with the meter and arrange to attend site if necessary • The Supplier(s) check that they can communicate with the meter and arrange with the customer to attend site if necessary This process becomes more important as smart meters are rolled out because of the reliance of both the electricity meter and any gas meter on communications. A Distributor would not expect to be included in any subsequent communications or work by the Supplier once the electricity meter has been moved or to incur any charges.	

SPEN	Non-confidential	In some circumstances this CP will improve the customer journey by removing the need for the customer to co-ordinate the service alteration works by the distributor and the meter move by the Supplier as the Customer would request the service alternation and the meter move, with the Distributor carrying out the works at the same time. However, if it's a non-standard meter, consideration needs to be given to the time to complete, cost of work and resourcing. Ensuring that customers understand when the Distributor is not able to / or has been asked not to include the meter move with the works as this could lead to negative results from the broad measure of customer satisfaction feedback.	
British Gas	Non-confidential	Maintained connectivity of WAN/HAN connections where Smart meters are existing. Some sites will have complex metering (radio tele-switching, contactors, volt-free switching cable, 5 terminal meters) and be out of scope to Distribution engineers unless upskilled to understand metering configurations and the ability to replicate the configuration at the new meter position. If the Cust electrician is not at site it would require fitting of an appropriate isolator based on the existing metering configuration.	
ScottishPower Energy Retail Ltd	Non-confidential	As we do not support the CP we have not provided a customer journey. However, we do have the following concerns / issues we would like to highlight: • Would this be offered UK wide or on a Distributor basis? • Although Distributors are MOCOPA Parties they are not subject to field auditing, therefore we will not have any policing of Distributor work on Supplier metering equipment.	

		• There may not be any prior notification of Distributor work on Supplier equipment, meter security maybe overlooked, future meter security may be in jeopardy as it is commonly known that Distributors do not usually carry sealing pliers and those that do have poor records. If any instance of poor workmanship is discovered, what assurances will we have that the Distributor operative is traceable. • What guarantees are in place to ensure smart connectivity to both the gas and electricity meters will be maintained after a meter move, especially those in prepayment mode which would lead to off supply as no top up could be processed? This is a serious risk and will lead to increased emergency call outs for Distributors and Suppliers and in many cases the prepayment function will need to be reverted to credit.	
SSE Energy Supply Limited	Non-confidential	A customer should be provided all the necessary information, which may be bespoke to their premises, about the end-to-end process that should occur before, during and after their meter move to make an informed choice about whether to contract with the Distributor to move their meter or whether to use the current process (i.e. coordination between Distributor, Supplier and customer's own electrician). A customer should also be informed of the opportunity to install smart metering at the same time as a meter move (if a heritage meter move is being requested), and informed that this can only be completed by their Supplier – as such a customer should be informed that they may need to arrange a separate smart metering appointment at a later date if they would like smart meters but choose a Distributor meter move. There is therefore a concern that	

		customers, in particular Business customers, may be reluctant to power down again at a later date, thus refusing a Smart meter install. We are concerned that a customer could still encounter frustration during the proposed Distributor meter move process if they are not fully informed of the potential need for their own electrician to be engaged for work as part of a meter move, or for a potential future Supplier smart metering appointment requirement (where applicable). At present a Supplier would take the opportunity to discuss with a customer requesting a meter move that they could exchange their heritage electricity (and gas) meter for smart/AMR meters at the same time as the meter move. If a customer only contacts the Distributor for a meter move, and does not contact their Supplier, it is a concern that Suppliers will lose this opportunity to have this conversation with the customer, and in turn lose meter exchanges which contribute to fulfilling the Supplier All Reasonable Steps obligation to promote the Smart Programme rollout. We are also concerned that the Distributor may not inform the Supplier of the new location of the meter. The Supplier needs to know this in order to inform the Data Collector. If the Distributor was to inform the Supplier of the change of meter location via automated flow, this would mitigate the concern. However, the communication would need to be via flow rather than another method of communication – the communication of this information should be entirely automated across the chain from DNO>Supplier>DC.	
Octopus Energy	Non-confidential	As the Comms hub will be de-energised then it is essential that the move does not interfere with the HAN connectivity of the CH, GSME & ESME. The distributors must also ensure the meters are left in a commissioned state or	

		if this is not possible, they should contact the supplier whilst on-site for remote assistance	
Opus Energy Ltd & Haven Power Ltd	Non-confidential	As specified by the proposer, if this CP was approved and Distributors were able to move meters during service alterations, we would expect this to be used as an opportunity for Distributors to offer a 'one-stop-shop' to customers for service diversions. As such, we would expect the Distributor to keep the Supplier notified in advance of any proposed works but for the Distributor to also manage the end-to-end communications with the customer. If Distributors move a meter at the request of the customer, because under the proposal, the Distributor is offering a 'one-stop-shop' to customers for service diversions, we believe that the Distributor should be responsible for invoicing the customer. If the Distributor was to instead charge the Supplier, to then pass these costs onto the customer for works that the Distributor had already completed, that would complicate the process, frustrate customers, and would create risks such as bad debt. The workgroup should review and clarify intended invoicing arrangements.	
Utilita Energy LTD	Non-confidential	At a high level, the draft process created by UKPN for the working group captures what most of the to be process should entail. However, more work is required to ensure that there are clear processes to follow when exceptions or issues occur that could detriment customers or suppliers. This mod must provide guidance on the following: • If the meter is damaged during the move.	

		• If the customer is left off supply or unable to stay on supply in the case of prepayment customers. • If the supplier is not able to regain smart communications after the distributor has completed the meter move.	
SSEN	Non-confidential	1. The customer will still be required to employ a competent electrical contractor to complete internal electrical work prior to service alteration work. Challenges may exist with: • Installations with off-peak heating via a time switch or radio tele-switch • Requests including removal of off-peak heating (i.e. E7 changes) • Smart meters with gas and IHU paired to meter • Customer Earthing not to appropriate standard • Three phase meters	
Working Group Conclusions:			

Company	Confidential/ Anonymous	3. Do you believe the customer experience can improve with Distributors moving meters?	Working Group Comments

EDF	Confidential	Yes, as a turn key solution the service could be of a real benefit to the customer and if the meter is left in the same correctly functioning condition as it was before the work is carried out. The risks are that the metering will be left in a lesser condition post relocation causing further work for Customer and MEM. (How will MEM/supplier be informed and who pays to correct)?	
WPD	Non-confidential	In some ways it has the possibility to improve the process as one company will attend and undertake all required work. Currently the customer is often left off supply for several hours between the DB completing their work and the attendance of the supplier MOp. It could have a detrimental effect if the comms link is broken through the work and leaves the customer unable to top-up or access the gas meter, which draws signals from the electricity meter comms hub.	
NPg	Non-confidential	Yes. The current process is one of the main causes of adverse customer service feedback from the delivery of service alterations. This is often not the fault of the Distributor but, unfortunately, it is the result of customer frustration caused by the current seemingly cumbersome and inefficient process. The customer has to liaise between the Distributor, Supplier (Meter Operator) and their own electrician for a service alteration. Removing one of those parties from the customer liaison process would likely improve the customer experience considerably.	
UKPN	Non-confidential	Yes – the CP seeks to mitigate the complaints that are addressed at the interface such as issues of the customer coordinating multiple parties to enable the service alteration. And the provision of choice means the customer enters the agreement with eyes open to the challenges	

ENWL	Non-confidential	We do believe the customer experience will improve with such instances negating the need for co-ordination between Distributors and Suppliers on the day of the appointment to carry out the service alteration. The customer should experience a seamless and efficient process. This process would ensure that the customer has an electricity supply as soon as a service alteration is completed. Experience indicates that, in most cases, the customer would be left without electricity until the Supplier attended to re-locate the meter. If work does not proceed as planned, from either a Supplier and/or Distributor perspective, the customer is then left in doubt as to how long they might be without power following the service alteration. This process removes that uncertainty and worry.	
SPEN	Non-confidential	Yes, we believe that where it is possible, single visits to carry out work and move meters will increase customer satisfaction. In the past, we have received negative customer service feedback relating to this area as customers do not understand why we cannot carry out the work.	
British Gas	Non-confidential	The customer would only have to deal with one party for both the service alteration and the meter move, meaning no reliance on exact timings for an additional party to attend site. This should result in a better customer experience as a single party would complete the entire task without a delay between service alteration and meter move; thus reducing length of time de-energised.	
ScottishPower Energy Retail Ltd	Non-confidential	No – but recognise there could be better coordination to allow the work to happen around the same time.	

SSE Energy Supply Limited	Non-confidential	We can understand the argument that customers could have an improved meter move experience by having less parties to need to co-ordinate to complete a meter move. However, it is arguable that the 'one-stop-shop' meter move envisaged by this proposal is oversimplified and unrealistic. As mentioned above in our response to Q2, a customer may also need to engage their own electrician to complete work to be carried out between the activity of the Distributor moving the connection, and the Distributor or Supplier/Supplier Agent moving the meter, and this work is all required on the same day. So there would likely still be a need for the customer to engage and co-ordinate more than one party to complete the meter move, and therefore potential for meter move failures when the customer has not made these arrangements or where one of the parties does not meet the customer arrangements.	
	Non-confidential		
Octopus Energy	Non-confidential	Yes – we agree this should enhance the customer experience	
Opus Energy Ltd & Haven Power Ltd	Non-confidential	Yes. As outlined within the CP, it should negate the need to coordinate the Distributor's physical service alteration and attendance of the Supplier's appointed Meter Operator on the same date. This should reduce lead times and reduce customer dissatisfaction.	
Utilita Energy LTD	Non-confidential	Distributors being able to move meters for service alterations, with the correct process and controls will make for a much more fluid customer journey with the distributor being able to act as a 'one stop shop'.	

SSEN	Non-confidential	Yes; Potential for single business to manage customer journey.	
Working Group Conclusions:			

Company	Confidential/ Anonymous	4. How can the Distributor interface with the customer better facilitate the quality of the HAN and WAN communication?	Working Group Comments
EDF	Confidential	Moving the SMET's should not adversely affect the WAN HAN/IHD signal. DB must ensure the meter is currently communicating correctly. When SMETS meter is moved if a recommissioning is required, then DB do not have access to the DCC to do this. DB would need to contact MEM immediately to correct especially if prepayment, onus should not be left with customer.	
WPD	Non-confidential	Any DB looking to undertake this work will need to undertake training of staff to meet SMICoP standards and ensure all comms on site are working when the alteration work is completed. Either this or they will need to have an agreement with suppliers to attend and complete remedial issues. This step deems the whole process pointless as if the supplier needs to attend why can they not attend on the original appointment date and complete the work.	
NPg	Non-confidential	Under the current service alteration process it is generally the Distributor who determines the new service position. The HAN and WAN	

		communication links are not usually a consideration when determining the new service position. There is potentially scope within the change proposal for suppliers to request this be taken into account as part of the overall service alteration process. The technicalities of how this would work would need to be discussed and determined through a working group to establish if it is a realistic proposal.	
UKPN	Non-confidential	Currently the suppliers have to manage the communication issues after the customer has arranged to move the service. With the DNO providing advice and checks at the initial service – this highlights the issue early and enables the customer to consider the impacts with the surveyor on both the Han and Wan considerations if the gas / electric / IHD are separated	
ENWL	Non-confidential	A Distributor does not interface with the customer in respect of HAN or WAN communications, and this isn't something we see a future need for or would wish to be involved in. Responsibility for HAN/WAN communications is not a Distributor obligation.	
SPEN	Non-confidential	Distributors can help customers understand the implications of moving meters on the communications.	
British Gas	Non-confidential	In the event a meter is moved, the impact on the SMWAN needs to be considered. For example moving the electricity meter may have negative consequences on the SMWAN connectivity to the property due to the new location being unsuitable. Also there will be implications from a CHISM point of view. For example, does the new location meet the CSPs requirements	

		and have the DNO engineers completed the required CSP training to manage comms hub installations. From a HAN point of view, consideration needs to be given to communication with other devices in the home, such as gas meters and PPMIDs. Increasing distance/obstructions to these devices will impact the performance of the smart metering system. Engineers will need to ensure connectivity prior to leaving site.	
ScottishPower Energy Retail Ltd	Non-confidential	Believe distributors should answer this.	
SSE Energy Supply Limited	Non-confidential	It is not clear to us how the Distributor interface with the customer could better facilitate the quality of HAN and WAN communication. Remote WAN checks are only relevant to the postal area. The actual location of the meter on site can affect WAN coverage as well as HAN connectivity between elements of the smart metering system. As such, we are still concerned that HAN and WAN communication could be negatively impacted by a Distributor completing a meter move. For example, should an electricity smart meter be moved too far from a gas smart meter, the gas smart meter will no longer be able to communicate over the HAN/WAN, and will no longer function correctly as a smart meter. The gas Supplier, who may be different from the electricity Supplier, will not know that the gas smart meter is no longer working until it fails to receive the remote communications from the meter. They will not know the reason for the meter failing to work is due to a meter move. Note that this could also have a subsequent consequence of impacting Supplier compliance with their licence condition SLC 49.4 to maintain working communications between	

		smart meters and Supplier communication systems/ the DCC. As such we believe it would be essential that DNOs should check and confirm that the HAN/WAN signal, including the signal between gas and electricity smart meters, is maintained as a key requirement of any meter move carried out.	
Octopus Energy	Non-confidential	Carry out a WAN/HAN check prior to starting works from the new meter position	
Opus Energy Ltd & Haven Power Ltd	Non-confidential	The Distributor should be well placed to advise the customer if an alternate location for the meter may provide a better quality of WAN and HAN communication (for example, relocation to a basement location could have an adverse impact). We believe that, if works by the Distributor impact the quality of the WAN and HAN communication, there should be an appropriate obligation placed upon the Distributor to explain the implications to the customer in order to reduce the risk of Suppliers receiving associated complaints from customers. Our expectation is that as long as no de-commissioning messages are sent to the meter due to the relocation, the meter should automatically re-establish connection with the HAN/WAN service, when power is restored by the DNO (same as for a power cut).	
Utilita Energy LTD	Non-confidential	Customers are in the best position to understand which areas have strong and weak signal. By having distributors work directly with customers with a consideration towards WAN & HAN, they would be able to determine where the meter could be relocated that would benefit both the customer for physical access – and have the highest likelihood of a strong HAN & WAN Communication.	

		Distributors should consider both the location of the electric meter and its ability to communicate remotely (WAN), and its distance to the connected devices in the home such as the In-Home Display and Gas Meter (HAN).	
SSEN	Non-confidential	Without specific knowledge of HAN and WAN coverage and operation, the Distributor may be limited on advice.	
Working Group Conclusions:			

Company	Confidential/ Anonymous	5. How can this CP and Distributors moving meters as part of service alterations support the smart meter programme?	Working Group Comments
EDF	Confidential	Currently it would improve and cheapen the roll out process for outliers where a SMET's meter needs moving. However, it will not support the programme if the meters lose comms with WAN HAN IHD /DCC. Loss of comms after the relocation will not aid the Smart Meter programme, this need's policing. Will this be restricted to 1 rate only and credit or Prepayment SMETs or KBM?	
WPD	Non-confidential	It does not promote the rollout as if the customer requires a meter move then it is an ideal opportunity for the supplier to enrol the customer in the SM programme if they do not have a smart meter, or update them to a SMETS2 if they have an older SMETS1 meter.	

		It could be detrimental if the comms issue occurs and customers are left unable to utilise the functionality of their smart meters.	
NPg	Non-confidential	We would not support the Distributor replacing a traditional meter with a smart meter during a service alteration. Therefore, we don't believe this CP will directly enhance the smart meter programme. However, it could potentially provide an opportunity for the supplier to instruct their meter operator to replace the moved traditional meter with a smart meter at the same or later date.	
UKPN	Non-confidential	The suppliers have clear annual targets for smart meter installations and the DNOs can support here to enable more Supplier resource to be focused on smart installs – the DNO customer communication is also committed where legacy meters are in place to advise customers to take the opportunity to upgrade to smart too.	
ENWL	Non-confidential	When a customer informs the Supplier that there is to be a service alteration and the electricity meter will require relocating, the Supplier then has the option to check if a smart meter is installed and, if not, agree with the customer whether one can be installed during the forthcoming work. This would improve the customer's smart meter journey.	
SPEN	Non-confidential	Whilst the Distributor can encourage the customer to arrange for the installation of a smart meter, given the volumes we do not expect this to make material difference to the smart meter programme.	

British Gas	Non-confidential	A service alteration would hopefully generate interest in the customer having a smart meter fitted and this could be influenced by the DNO at the time of visit. The service alteration could also facilitate a meter exchange that was previously aborted due to space constraints or similar.	
ScottishPower Energy Retail Ltd	Non-confidential	We believe this CP cannot support the smart meter programme as the Distributors are not a MOP so are not obligated under the SMICOP. This means they do not have the relevant skills or experience. Further, they would be required to carry a stock of every meter variant and for every Supplier, this would be totally unworkable, including an in-depth knowledge of meter functionality and a stock of every supplier's leave behind literature.	
SSE Energy Supply Limited	Non-confidential	We are not convinced that Distributors moving meters will support the smart programme. As per our answer to Q2 above, at present a Supplier would take the opportunity to discuss with a customer requesting a meter move that they could exchange their heritage electricity and gas meters for smart/AMR meters at the same time as the meter move. If a customer only contacts the Distributor for a meter move, and does not contact their Supplier, it is a concern that Suppliers will not have this opportunity for this conversation with the customer, and in turn lose meter exchanges which contribute to fulfilling the Supplier All Reasonable Steps obligation to promote the Smart Programme rollout. The proposal does not request provisions for Distributors to carry out a meter exchange/install in order to fit the customer's premises with smart	

		meters, so every Distributor heritage meter move would be a lost smart meter exchange in terms of the intentions of the smart programme. As noted above in our response to Question 4, we are also concerned that HAN and WAN communication could be negatively impacted by a Distributor completing a meter move, which in could negatively impact the smart programme and Supplier obligations. For example, should an electricity smart meter be moved too far from a gas smart meter, the gas smart meter will no longer be able to communicate over the HAN/WAN, and will no longer function correctly as a smart meter. The gas Supplier, who may be different from the electricity Supplier, will not know that the gas smart meter is no longer working until it fails to receive the remote communications from the meter. The gas Supplier (if different from the electricity Supplier) will not be aware of the meter move, and therefore would not be able to ascertain without a site visit that this is the reason the gas smart meter is no longer communicating. They will not know the reason for the meter failing to work is due to a meter move. Note that this could also have a subsequent consequence of impacting Supplier compliance with their licence condition SLC 49.4 to maintain working communications between smart meters and Supplier communication systems/ the DCC. As such we believe it would be essential that DNOs should check and confirm that the HAN/WAN signal, including the signal between gas and electricity smart meters, is maintained as a key requirement of any meter move carried out.	
Octopus Energy	Non-confidential	If a smart meter is already on site then make sure the assets are re commissioned. If a traditional meter is on site a suitable discussion with the customer detailing the benefits of smart should be provided.	

Opus Energy Ltd & Haven Power Ltd	Non-confidential	If Distributors explain to customers the potential impacts that a particular meter relocation request may have on the quality of the WAN and HAN communication, and this results in fewer instances of poor signal issues, it should positively support the smart meter programme. However, if service alterations are made, and it is a traditional meter in situ rather than Smart meter, then missing the opportunity to replace the traditional meter with a Smart meter at the same time could frustrate the Smart rollout as Customers are more unlikely to accept a subsequent power-down to facilitate a Smart install. If it is a traditional meter in situ, in order to support the smart meter programme, we believe that the DNO should be obliged to coordinate with the Supplier/MOP to facilitate a Smart install.	
Utilita Energy LTD	Non-confidential	They could assist suppliers in the following ways: • Smart metering equipment tends to be larger that legacy metering devices. Distributors should consider there is enough space in the new location for a supplier to be able to upgrade the customer to a smart meter. • The meter move itself could facilitate the installation of a smart meter. For example, certain sites will currently have issues with HAN/WAN due to the current meter location, preventing a smart install. If during a meter move the distributor performs signal checks in each potential location, they could help facilitate a future install.	

SSEN	Non-confidential	Potential for Distributor to get Supplier engagement from any site survey and highlighting a dump meter is installed.	
The Working Group Conclusions:			

Company	Confidential/ Anonymous	6. Communication between the customer, Distributor and Supplier will be key for the success of this CP. What and how should the communications between each associated Party be like? (Customer<->Distributor) (Distributor<->Supplier) (Supplier<->Customer)	Working Group Comments
EDF	Confidential	The Distributor needs to do as currently i.e. communicate to MEMs, a change of meter location. Currently a list of DTC code does exist i.e. meter locations. A free format text could also be used as supplementary information.	
WPD	Non-confidential	Clear timescales and responsibilities need to be noted by supplier parties to identify DB's that are willing undertake meter moves, and this needs to be clearly communicated to the customer.	

		The customer generally contacts the DB as the service cable will need altering to allow the required service alteration to take place. At this point the customer needs to be told of the process to get the meter moved in the DB area they live.	
NPg	Non-confidential	The current communication path starts with the customer requesting the service alteration with the Distributor. This would remain. There may or may not need to be any communication between the Distributor and Supplier. If a charge was to be levied then there would naturally need to be some sort of communication. However, if there isn't a charge to levy there may not need to be any communication. Currently under DCUSA the Distributor may work on and move (only very slightly) the meter. There is no communication for between Distributor and Supplier for this activity. Therefore, a service alteration meter move is an extension of this so there may not be the need for any communications. Ultimately, should communications between Distributor and Supplier (and vice-versa) be required then it would be via the industry standard use of data flow(s).	
UKPN	Non-confidential	Customer<->Distributor:- Customer request service alteration though online portal which has advice on the offering Survey booked and surveyor attends to agree detail of the offering with the customer Quotation provided showing the scope of work agreed and requirements Highlight possible Han & Wan Concerns for customer to discuss with supplier	

		Distributor<->Supplier:- Advise of appointment to carry out work – D0368 Advise Supplier that work is completed – Flow to be agreed Highlight if here are any communications issues after meter move – technical contact Supplier<->Customer Customer contacts the supplier to move the meter if he chooses to or if the DNO doesn't provide the service and seeks to coordinate the service with the preferred DNO date. Customer contacts the supplier to review that Han & Wan issues that may be caused by moving the electricity meter away from the Gas meter or the IHD – or that there may be Wan issues – e.g moving from outside to deep in basement	
ENWL	Non-confidential	See customer journey in question 2	
SPEN	Non-confidential	Customer – Distributor – we expect no change to the current communications, however may now also include discussion regarding the installation of a smart meter. Distributor – Supplier – a Flow would be required to communicate changes to be made and when and also when works complete. A flow would also be needed to co-ordinate the work with the Supplier if the Distributor is not to carry out the meter move.	

		The Supplier must be able to react to the date of the service alteration to be available to install/move the smart meter. It would be detrimental to customer service for the customer not to have the meter live the same day as the service was altered. Responsibilities of the Supplier and Distributor need to be understood and any impact on broad measure of customer satisfaction reflected.	
British Gas	Non-confidential	Cust/Distributor – this would exclude the Supplier other than a dataflow flagging that a meter move had taken place Distributor/Supplier – if the end to end task was carried out by the Distributor there would be no need for exact communication other than the dataflow confirmation and the Supplier could generate a communication with the Cust if appropriate. Supplier/Cust – the dataflow could generate communication for a meter exchange to Smart If the Supplier was to be involved in the meter move as part of the service alteration the relationship would be as per BAU process.	
ScottishPower Energy Retail Ltd	Non-confidential	(Customer<->Distributor) - Customer requests the service alteration and the Distributor completes a survey and provides a quote. Distributor advises Customer to notify Supplier, or makes the call themselves in order to arrange a mutually convenient appointment for all three parties (Distributor<->Supplier) Notification from Distributor to Supplier to confirm appointment for the alteration completion time.	

		(Supplier<->Customer) Notification from Supplier to Customer of a meter move appointment around the time of the service alteration completion time.	
SSE Energy Supply Limited	Non-confidential	We would need to know more detail of the DNO proposed solution routes for interactions between parties before we can fully assess and give a view on all communications between each associated party. We note that the draft process map shows no communication between DNO and Supplier, leaving the decision on whether Supplier or DNO moves the meter with the customer. If the DNO is chosen by the customer to complete the meter move, it is imperative that the DNO communicate this to the Supplier to give the Supplier opportunity to refuse (for example, where the Supplier will still have to facilitate complex/ time switch meter moves rather than the DNO) – for which a new flow would be required to enable this as an automated function. Where a meter move could not be booked for the customer the reason for this would need to be properly explained to the Customer by the Distributor. We would require that the Distributor send appropriate automated flows to advise of the meter move/ new meter location, to update our systems and so that the Data Collector could also be updated. We see that flow D0215 from DNO to MOP and Supplier has a field for meter location so could perhaps facilitate this.	

Octopus Energy	Non-confidential	Communications between distributor and the customer should be according to customer preference and does not need supplier intervention. Advanced notice to the supplier required through a pre-agreed process, preferably digital. Post install information sent digitally in a defined format to enable automatic processing. Full job sheet should be available upon request.	
Opus Energy Ltd & Haven Power Ltd	Non-confidential	In line with our response to Q2, although we would expect the Distributor to keep the Supplier notified in advance and throughout the customer journey of any proposed works, we would also expect the Distributor to manage the end-to-end communications with the customer. From a Distribution to Supplier perspective, the Supplier should be notified of the Meter Serial Number, the latest recorded meter reading and the location of the meter (for example, if the meter has been relocated, it is important that the Data Collector is aware in order to reduce the number of D0004s 'Notification of Failure to Obtain Reading').	
Utilita Energy LTD	Non-confidential	<u>Customer <-> Distributor</u> • The customer will need to be made aware of options available to them. • Where a smart meter could be installed, the customer should be advised or encouraged to have a new install to support the smart meter programme.	

		• Advice on meter location where HAN/WAN is at risk, to ensure the protection of connection with both signals. <u>Distributor <-> Supplier</u> • Communications required from distributor to supplier have been outlined in our answer to question 7. <u>Supplier <-> Customer</u> • The customer would have to contact the supplier if the supplier were their preferred option or they would like a smart meter install, to move the meter in order to schedule the visit. If the customer has prepayment meters and experience commissioning issues, they may need to contact the supplier to rectify the issue of lost credit.	
SSEN	Non-confidential	To benefit an effective customer journey, communications should ideally be customer>DNO>Supplier with Supplier managing MOp needs as required	
Working Group Conclusions:			

DCP 349 'Effectiveness of the current provision of unsecured cover under Schedule 1' COLLATED CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS

Company	Confidential/ Anonymous	7. Supplier: What level of information is deemed necessary to be received from the Distributor? (is the new meter location required / is it currently maintained?)	Working Group Comments
EDF	Confidential	Any Distributor changes to meter location would need to be communicated to supplier/MEM. Example Height of meter location, has the meter been moved, have the meter seals been broken and replaced, has connectivity been maintained, is access to the meter permissible and safe etc	
WPD	Non-confidential	N/A	
NPg	Non-confidential	N/A	
UKPN	Non-confidential	There is currently no facility from the DNO to supplier for this so it would need a separate flow and possibly a contact facility with the suppliers as an interim.	
ENWL	Non-confidential	Not applicable	
SPEN	Non-confidential	N/A	
British Gas	Non-confidential	The old and new meter position would benefit the Supplier as they can then determine if an issue or opportunity exists dependant on if the meter is legacy or Smart.	

		Smart - could generate flags of non-communication Legacy – could generate a Smart install Confirmation that the HAN/WAN connectivity has been maintained OR if any issues have been identified as part of the meter move. Distributor to send a D0150 flow to the NHHMOA who in turn will send update flows to the supplier	
ScottishPower Energy Retail Ltd	Non-confidential	If this is approved, then we would need an industry approved flow containing a complete set of data (meter serials, readings, associated equipment listed, confirmation of seal IDs before and after, any defects and confirmation that smart metering systems remain connected (WAN and HAN).	
SSE Energy Supply Limited	Non-confidential	We would require that the Distributor send appropriate automated flows to advise of the meter move/ new meter location, to update our systems and so that the Data Collector could also be updated. Note that an update to Supplier systems/ processes may be required and have associated costs/time/resource implications for Suppliers ahead of implementation of this change.	
Octopus Energy	Non-confidential	Postcode, MPAN, MSN, Read, meter position	
Opus Energy Ltd & Haven Power Ltd	Non-confidential	In line with our response to Q6, from a Distribution to Supplier perspective, the Supplier should be notified of the Meter Serial Number, the latest recorded meter reading and the location of the meter (for example, if the	

		meter has been relocated, it is important that the Data Collector is aware in order to reduce the number of D0004s).	
Utilita Energy LTD	Non-confidential	Below are the communications the distributor should sent to supplier for these service alterations. • If suppliers are always advised of meter moves, this will improve the customer journey as the supplier has the full picture if that customer has any future issues the supplier needs to deal with. • Where metering equipment is damaged by the distributor the supplier will need a method in which they can recover MAP stranded asset charges from the distribution party. • Where the meter location is changed the appointed meter operator should be informed to enable them to amend the meter location data item. This is important especially in cases where access is restricted in anyway (i.e., ladder required, communal cupboard) for a number of other industry processes including data retrieval and meter installs/repairs. • The distributor should record a reading before removing the meter. This negates any potential risk of not having a final read where an issue may occur with the meter during the move. Currently there is no suitable method for this information to be communicated to suppliers or meter operators, and believe email as proposed in the draft process diagram would have an insufficient level of reliability and accuracy.	

SSEN	Non-confidential	N/A	
Working Group Conclusions:			

Company	Confidential/ Anonymous	8. What are your thoughts on appropriate auditing of meter moves if this CP is approved?	Working Group Comments
EDF	Confidential	The work needs to be carried out by a MOCOPA registered party, if not MOCOPA registered, they will still need to be working to the same standards that other MOCOPA signatories adhere to. How will this be policed? The DB must be made to perform the same audit regimes as currently exists for MEMs, i.e. once every year on WIP and PC metering jobs.	
WPD	Non-confidential	If additional training is required this will need to be to national standards. DB's complete regular field checks and audits on craft staff, so this should cover the additional work.	
NPg	Non-confidential	As stated in Q6 Distributors moving meters could be seen as an extension of the current arrangements in DCUSA. Distributors are not currently audited on site. However, it is accepted that a full meter move to a new location is more involved than a meter move a few inches so acknowledge that it could mean the Distributor may be required to be audited for this activity.	
UKPN	Non-confidential	The operational content aligns with Network Operation activity and the DNO Operational Audit can provide the necessary onsite audit facility for meter moves together with a desktop audit facility through selected jobs.	

ENWL	Non-confidential	Distributors are included in the audit regime under the MOCOPA, but details of additional activities being audited would need to be specified to help gauge any increase in costs, which may be a barrier.	
SPEN	Non-confidential	We would not expect any additional auditing to be necessary.	
British Gas	Non-confidential	As both parties (or sub-contractors) are members of MOCOPA there is an obligation of compliance to the Code (i.e. cable termination, identification, sealing of equipment) so inclusion in site audit of Distributor could be included as part of annual audit requirements.	
ScottishPower Energy Retail Ltd	Non-confidential	The distributor has a duty to undertake this, the Suppliers should undertake a separate regime for assurance purposes and MOCOPA must do the same.	
SSE Energy Supply Limited	Non-confidential	A robust audit process would need to be set up in order to ensure that the Distributor is accountable for conducting a meter move for the customer to the same standard as a customer could expect from their Supplier/ Supplier Agent, as similar as possible to the MOCOPA agreement. The audit process should also encompass Distributor accountability for the necessary communications between Distributor>Customer and Distributor>Supplier, and there should be a mechanism to enforce Distributor liability for costs should the meter asset or related equipment (e.g. smart comms hub) be damaged during a Distributor meter move and require replacement by a Supplier/ Supplier Agent, and any related customer compensation.	
Octopus Energy	Non-confidential	The distributor should be MOCoPA accredited and as such be directed by the requirements contained within.	

Opus Energy Ltd & Haven Power Ltd	Non-confidential	Provided that requirements such as Health and Safety are adhered to, in line with common industry practice, we do not foresee any need for specific audits of this process. However, if the Supplier is required to instruct a Meter Operator to carry out remedial works caused as a direct result of works carried out by the Distributor, then there should be appropriate provision for recuperation of costs to the Supplier.	
Utilita Energy LTD	Non-confidential	The Distributor should be audited in a robust way to ensure they are adhering to the same standard as supplier/supplier agents the audit process should contain distributor accountability for communication between involved parties and it should contain the mechanism to enforce liability where supplier assets are damaged as described in question 7. We think that the MOCOPA agreement would be the best standard to be adhered to.	
SSEN	Non-confidential	There should be no cost impact if DNOs are to be audited for meter activities. There is a need to clarify what 'authorisations' would be required for a DNO Op to complete meter work.	
Working Group Conclusions:			

Company	Confidential/ Anonymous	9. Distributor: What is the annual volume of service alterations for each Distributor normalised for COVID.	Working Group Comments
EDF	Confidential	N/A	

WPD	Non-confidential	The total number of enquiries for service alteration work within WPD are; 2019 – 9927 2020 - 9798	
NPg	Non-confidential	2019 Northeast (15 MPAN) – 837 Yorkshire (23 MPAN) – 1309 2020 Northeast – 722 Yorkshire – 1051	
UKPN	Non-confidential	In a normal year 5000 across LPN SPN & EPN	
ENWL	Non-confidential	Within our Distribution Services Area we undertake on average around 800 service alterations annually.	
SPEN	Non-confidential	SP Manweb = 520 SP Distribution = 514	
British Gas	Non-confidential	N/A	
ScottishPower Energy Retail Ltd	Non-confidential	N/A	

SSE Energy Supply Limited	Non-confidential	N/A	
Octopus Energy	Non-confidential	N/A	
Opus Energy Ltd & Haven Power Ltd	Non-confidential	Opus Energy Ltd & Haven Power Ltd	
Utilita Energy LTD	Non-confidential	N/A	
SSEN	Non-confidential	SSEN – Unable to confirm numbers across two regions	
Working Group Conclusions:			

Company	Confidential/ Anonymous	10. Are there any other issues not covered in the CP that would need to be addressed?	Working Group Comments
EDF	Confidential	Are the DB going to locate the meter according to the standards set by each MEM? MEM's have some different insistencies regarding meter locations, how will DB ensure they are not falling foul of the restrictions we place on customers regarding meter locations.	

		Prepayment SMETS meters currently loses signal readily, how will this be reinstated (expensive standby call for MEMS who pays)? Historically no DBs have undertaken multi-rate metering moves, will this stay the same? If DNO are moving the service of a legacy meter installation, then contact MEM so we can co-ordinate with the DB change for a SMETs meter. Will the relocation work be carried out by all operatives or only trained operatives? Will there be an SLA for agreeing SMETS 1 or 2 should still be working when job is completed? Liabilities, damages or move it where it does not have a signal? Whose responsibility is it?	
WPD	Non-confidential	DB's need access to the DCC comms checker to confirm signal strength in the location of the alteration work.	
NPg	Non-confidential	Agreement would need to be reached to determine if the Distributor has the option to charge the supplier/customer for providing this service. Also, the Electricity Act (Paragraph 1(3) of Schedule 7) makes it the Supplier's responsibility to determine the position of the meter. Therefore, technically, the supplier should determine a new meter position. However, as referenced previously, it is currently common practice for the Distributor to determine the new service position without reference to the relevant supplier who is supposed to determine the meter position. This issue will have to be factored into any solution.	

UKPN	Non-confidential	Meter Move Training Facilities A gallery of Smart Meter types would help training facilities	
ENWL	Non-confidential	Depending on what current Supplier responsibilities are, the potential inclusion of the gas supplier in this process may need to be considered. We would just highlight that Distributors would not be responsible for metering issues after a meter relocation, unless it involves workmanship/quality of meter tails and that the HAN/WAN communications obligation sits with Supplier Parties. Also, a cross-charging mechanism would not be necessary for this process.	
SPEN	Non-confidential	The CP maintains the "supplier hub principle" and allows Suppliers to opt out of the Distributors undertaking this service. The Suppliers choice should not impact on the Distributors broader customer service feedback. Currently Distributors use temporary seals, process required to notify Supplier or will there be a requirement for Distributors to provide permanent seals. There will be process and cost implications. Training costs to move non-standard / new metering to be considered. Mechanism to recover costs.	
British Gas	Non-confidential	A procedure needs to be in place where the Distributor has a means of communicating directly with the Supplier if a "No Supply" at the meter	

		exists after the meter move and re-energisation of supply as this would directly impact on the customer. The working group should consider how any instances of damage to the metering equipment caused by the Distributor is covered by the DCUSA. Is there a straightforward process for dealing with issues caused by a meter being moved by the Distributor? Does the DCUSA currently provide for this eventuality? If additional visits are required by the Suppliers meter operator as a result of the Distributor moving the meter are these re-chargeable to the Distributor?	
ScottishPower Energy Retail Ltd	Non-confidential	We would recommend Distributors lead the project of moving the supply and arrange the meter move, directly via industry flows to both the MOP and the Supplier. This would need to be done in enough time to allow either the MOP or the Supplier to reject the visit if required. This removes all the risks while improving the overall customer experience. This would need changes to a number of industry flows. We believe there is no business case for this CP. There may be individual distributors that would like to offer this service, but it does not illustrate and end to end process and as such will not resolve the issue. Further, we would request the annual volume of meter move requests from customers for this Distributor and all others, compared to the volume of meter moves rejected by Suppliers, and finally, how many complaints have been recorded to warrant this CP. We have a number of risks we would request the working group takes on board.	

		1. Distributors generally are not in a position to undertake this work, many use subcontractors and that would complicate matters even more (for example not sealing meters creating a theft risk), creating additional risks to the Suppliers and their MOPs. 2. The Supplier will always remain responsible for any meter failure or incident associated with the metering equipment; therefore, the Supplier should only permit Supplier appointed MOPs to undertake this work. MOPs are heavy regulated by the Suppliers, MOCOPA & SMICOP through rigorous audit regimes, which is not the case for Distributors. 3. Smart connectivity would be at risk if the meter is moved and the resolution would be out of the Distributors hands, this would lead to complaints and in some cases an off-supply situation (prepayment mode).	
SSE Energy Supply Limited	Non-confidential	We agree in principle that the current requirement for a customer to separately engage multiple parties (Distributor, electrician, Supplier) to enact a meter move is not ideal for customers, and it can be difficult for a customer to understand what the different parties need to do and why. We support improving the process for customers. Whether or not the DCP 383 change proposal progresses to implementation, we also suggest a dataflow from DNO to Supplier is created and sent when the DNO has a Service move job booked – this would be an efficient way of prompting the Supplier to arrange a job to change/ move the meter and take the onus off of the customer to contact the Supplier.	
Octopus Energy	Non-confidential	Consider installing an Isolator on all repositions	

Opus Energy Ltd & Haven Power Ltd	Non-confidential	In line with our response to Q2, if Distributors move a meter at the request of the customer, then the Distributor should be responsible for invoicing the customer.	
Utilita Energy LTD	Non-confidential	Depending on their, functionality the risks that Prepayment Customer's may face when their meter is disconnected and installed at a new location. These include the reset of: • The Customer's balance • Tariff Settings • Friendly Credit Settings • Emergency Credit Settings • Time switch Settings for E7 / E10 (and other time of use tariffs) This could leave the customer financially disadvantaged or lead to interruptions to their supply until it has been resolved by the supplier. We think further work is required to understand the risks for prepayment, and what solutions should be implemented to mitigate them.	
SSEN	Non-confidential	Is there a need to consider transfer of information to reflect service alteration by a Distributor even though no change of meter has occurred?	

Working Group Conclusions: