Company	Confidential/ Anonymous	1) Do you understand the intent of the CP?
British Gas	Non-confidential	Yes, we understand the intent of the change proposal.
Drax Group (Opus Energy and Haven Power)	Non-confidential	Yes.
Electricity North West	Non-confidential	We do understand the intent.
Northern Powergrid (Northeast) plc and Northern Powergrid (Yorkshire) plc	Non-confidential	Yes.
SP Distribution and SP Manweb	Non-confidential	Yes, we understand the intent of the CP.
	Confidential	Yes, in full.
UKPower Networks	Non-confidential	Yes clear on the intent to improve customer service
Utilita Energy LTD	Non-confidential	We understand the intent of proposal 383 is to create an easier path for customers to undertake a service alteration involving a meter move. Currently the process requires that the customer contacts the DNO to move the service and also contact the supplier to move the meter, needing to co-ordinate the times between both parties. This proposal seeks to ease that customer journey by offering a 'one-stop-shop' with the DNO moving both the meter and the service.

Western Power Distribution	Non-confidential	Yes
SSE Energy Supply Ltd	Non-confidential	Yes. To allow DNOs to offer a service to complete non-complex whole current meter moves (service alterations) when customer requests it; when DNO offers this service (not all DNOs will) and the supplier allows it (i.e. has not informed DNOs on a universal basis that supplier does not allow it on any of their assets).

Company	**Confidential/ Anonymous**	2) Are you supportive of the principles of the CP?
British Gas	Non-confidential	Yes, the principle should mean a simpler customer experience, however there are reservations in the potential emergency work if a supplier is required to attend site unplanned
Drax Group (Opus Energy and Haven Power)	Non-confidential	Yes. We agree with the proposer that this proposal offers opportunities to improve the customer journey by simplifying the coordination of attendance on site and minimising time off supply and overall inconvenience to the customer. The customer feedback provided in attachment 2 provides some useful examples of where avoiding the need to coordinate separate appointments should reduce timescales for completion of works and so enhance the customer experience.
Electricity North West	Non-confidential	While we support the principles from a customer perspective, we are not supportive from an industry perspective as DNOs are not responsible for meters and this change has the potential to blur those clear lines of responsibility.
Northern Powergrid (Northeast) plc and Northern Powergrid (Yorkshire) plc	Non-confidential	Yes.

SP Distribution and SP Manweb	Non-confidential	Yes.
	Confidential	In principle Yes, provided this does not become an obligation for the Distributor.
UKPower Networks	Non-confidential	Yes as the proposer
Utilita Energy LTD	Non-confidential	We are supportive of the principle of improving the customer journey, and believe that this modification will achieve that outcome with the DNO working as a 'one-stop-shop' for the customer. So long as: • The DNO's technician is training correctly to move the metering equipment safely and in full working order. This is particularly relevant in the case of smart meters, both SMETS1 and SMETS2. • The supplier is informed of the meter move. Amongst other issues, failure to do this could lead to customer service problems down the line for the supplier. • The customer is advised of the option of the supplier also carrying out the work.
Western Power Distribution	Non-confidential	Yes
SSE Energy Supply Ltd	Non-confidential	Yes. It could improve customer experience of non-complex meter moves due to customer not having to coordinate both DNO and supplier/MOP to complete a meter move.

Company	**Confidential/ Anonymous**	3) Do you agree with the Working Group analysis on what meters should be in and out of scope for this CP? If not, please provide your reasons.
British Gas	Non-confidential	Yes

Drax Group (Opus Energy and Haven Power)	Non-confidential	Yes. We agree that the scope of this proposal should apply to whole current meter changes only (and exclude CT metering) and that where complex/non-standard metering arrangements are encountered and not recognised by the Distributor, these should be flagged for action by suppliers as part of the pre-site survey. By limiting the scope to meters that are recognised by the Distributor, it should increase the likelihood of an efficient one stop shop process, improving the customer experience by reducing the time that the customer is off supply.
Electricity North West	Non-confidential	We are comfortable with the analysis that shows which meters would be in and out of scope for this change proposal as the split seems appropriate. We were pleased to note in the consultation that a guidance document is to be published. However, this change proposal does not appear to fully resolve the underlying issues as it only addresses certain meter types.
Northern Powergrid (Northeast) plc and Northern Powergrid (Yorkshire) plc	Non-confidential	Yes, providing the DNO has the option to opt out of moving a particular meter on an individual basis. A DNO should have the right to remove an in scope meter if the DNO does not want to include it within the service it provides. For example, a DNO may want to include traditional meters but not smart meters or perhaps credit meters but not pre-payment meters in the service it provides. Also, the title is wrong as 'normal meters' should not be included as not all items on the list are meters. Also, 'resin security meter tails in place' is not a familiar term and we assume these are the pre-formed line and neutral tails within a security block. Just to be clear, standard meter tails i.e. separate double insulated line and neutral tails are also in scope. Alternatively, the title could be left as 'In scope meters' but non-meter references could be included in the general text.
SP Distribution and SP Manweb	Non-confidential	Yes, we agree with the in-scope parameters for this CP.
	Confidential	Yes, but in acknowledging this applies to Whole Current Metering, we feel that Prepayment Meters (PPMs) for reasons stated in response to Q6 should perhaps fall outside this scope.
UKPower Networks	Non-confidential	Yes - but conscious that meter scopes change and have added a facility to update – whole current meters are expected to account for 90% of the single phase meter population.

Utilita Energy LTD	Non-confidential	We agree the list put forward by the working group is an adequate reflection of what type of meters should be worked on. However, we would ask that meters with an Alt HAN solution installed would be considered in the scoping. A recent BEIS decision has determined that "Bridge 1" from ALT HAN co will sit between the DNO main fuse/Cutout and the electricity meter. This would also need to be relocated at the same time as time to maintain HAN.
Western Power Distribution	Non-confidential	Yes
SSE Energy Supply Ltd	Non-confidential	No. Single phase AMR and HH meters should be added to the 'out of scope' list. These do not have an IHD, therefore the Distributor surveyor will not be able to test connectivity.

Company	**Confidential/ Anonymous**	4) Do you believe that the front end and the delivery process outlined in the diagrams in Sections 4.14 and 4.15 adequately supports the moving of a meter within a service alteration?
British Gas	Non-confidential	Yes. It is important that the agent is qualified and has the right equipment to check connectivity and signals
Drax Group (Opus Energy and Haven Power)	Non-confidential	Yes. Our only comment is that references to "UKPN" should read "DNO" because this process applies equally to all Distribution Network Operators (DNOs).
Electricity North West	Non-confidential	It would be useful for the processes to be shown in more of a responsibility chart than a flow diagram. For the front-end process - As a DNO we could only provide generic advice to the customer and advise the Supplier when the work will be done. This enables the Supplier to carry out its remote communication/connectivity checks, which in turn would reduce the number of physical visits a Supplier would need to undertake. Although the process as described suggests there will be a visit for the quotation, we may decide not to make a pre-quote visit in an effort to keep costs down for our customers.

		On the delivery process there is mention of checks on whether the 'connectivity lights' are on/off which isn't an activity we perform now or would want to in the future. Our understanding is that where connectivity is lost the meter would still function albeit not 'smart', the customer would be on supply and contact the Supplier to recalibrate the meter. If this change was implemented clarification of what these checks actually involve would be required together with ongoing training/guidance for operatives.
Northern Powergrid (Northeast) plc and Northern Powergrid (Yorkshire) plc	Non-confidential	The diagram title of 4.14 should reflect the outcome of changes as a result of our comments for Q3. There is a missing connectivity line from the first surveyor box. Also, many of the connectivity lines in the diagram of 4.14 are not correctly aligned and are a little confusing so making it difficult to flow through the process to enable further comment. In the delivery process of 4.15 there is no link through from DNO to inform the supplier of the meter move via data flow where there were DCC connectivity issues. Is this intentional?
SP Distribution and SP Manweb	Non-confidential	Diagram needs updating. Missing link between Surveyor and Customer. Also arrow direction into decision box "Is Alternative meter location agreeable to customer?" Is incorrect 4.14 – No, SPEN operating model is completely different and would need drastic change 4.15 – Yes
	Confidential	Yes.
UKPower Networks	Non-confidential	Yes reviewed with DNO's and Suppliers and provides a sound methodology to improve from the status quo
Utilita Energy LTD	Non-confidential	The management of the process shown in the diagram will be down to DNO parties. However, on sections which impact suppliers we agree it adequately supports the modification.
Western Power Distribution	Non-confidential	Yes

SSE Energy Supply Ltd	Non-confidential	The front end diagram (in section 4.14) should be re-ordered to reflect that the customer is provided the quote before choosing who will move their meter. The delivery process diagram (in section 4.15), the Meter Operator (MOP) has been left out of the updates process – the MOP should be included in comms from the Distributor for the process 'Confirm Meter Moved via data flow'. This should also be reflected in the process at 'Supplier and MOP updates their systems with new meter location'

Company	**Confidential/ Anonymous**	5) Do you agree that the liability is adequately covered with the addition of the new Clause detailed in Section 4.18?
British Gas	Non-confidential	Yes, we agree the additional clause provides adequate cover.
Drax Group (Opus Energy and Haven Power)	Non-confidential	Yes. Potentially, suppliers could incur additional costs, not necessarily covered by the new Clause; for example, costs associated with a customer complaint as a direct result of the Distributor acting contrary to Good Industry Practice in relocating the metering equipment. However, we believe that the intent of the clause is sufficient to cover directly attributable costs in most circumstances. It is recommended that, as is the typical industry practice by Meter Operators, that Distributors take photos before and after any meter move in the event of any potential issues or claims.
Electricity North West	Non-confidential	If this change was implemented this would be a reasonable clause to have, but for the avoidance of doubt the DNO would not be responsible for connectivity/metering issues should a meter relocation be undertaken, unless it involved workmanship/quality of meter tails. The HAN/WAN communications obligation sits with Supplier Parties.
Northern Powergrid (Northeast) plc and Northern Powergrid (Yorkshire) plc	Non-confidential	The clause referred to in 4.18 is about the exchange of information rather than liability. We assume the question is referring to the proposed additional clause in 4.19? We would agree with the proposed clause 4.19.

SP Distribution and SP Manweb	Non-confidential	Yes – but we need to ensure that pre-work assessments are conducted and recorded to ensure that evidence is well documented.
	Confidential	We agree
UKPower Networks	Non-confidential	Yes reviewed with DNO's and Suppliers and provides a sound methodology to improve from the status quo
Utilita Energy LTD	Non-confidential	The drafted clause does not deliver any substantive change to the DCUSA in terms of provisioning for liability. Whilst it asks parties to exchange information where an 'incident' occurs, there is no clear indication of what an 'incident' has to be to trigger this clause. There is also no means for this to be carried out, for the legal text to fully address the issue of liability it will need to be clear on where someone needs to be deemed liable, and provide a process by which a party can seek to initiate discussions and time frames for issue resolution.
Western Power Distribution	Non-confidential	Yes
SSE Energy Supply Ltd	Non-confidential	We do not agree that the liability is clearly covered by the new clause detailed in 4.18/4.19 of the consultation. Our comments and suggested drafting are as follows: • The proposed additional clause on indemnity cross refers to Clause 25.25 – this does not make sense given Clause 25.25 relates to the Company offering its services to the Customer to relocate metering equipment rather than any actual relocation works. • Users (suppliers) would want the Company to be liable for any loss / any third party claim which arises due to an act or omission of the Company (or any person / party acting on behalf of or under instruction of the Company) in connection with the relocation of metering equipment – rather than limiting to direct loss or breach of good industry practice which may not be carved out in the third party MAP agreements. Suppliers would not want to find that their indemnity cover is less than their liability in the MAP agreements so will want to ensure that any third party claims, from a MAP or otherwise are fully covered by the indemnity. • Suppliers would also expect this indemnity should be carved out from any liability cap. If there are broader liability provision/ caps in DCUSA (are there?) these should be updated to exclude this indemnity.

		As such, we suggest the below amends to the drafting of the proposed additional clause to add wording in the indemnity to refer to it being provided on an uncapped basis: Suggested drafting: The Company shall indemnify the User against all expenses, liability, loss or damage incurred by the User ~~as a consequence of~~ or any claim, action or litigation against the User (or any of its Affiliates) by any third party (including without limitation the User's liability to the Meter Asset Provider for the Meter Asset Provider's ~~direct~~ losses for physical damage to the metering equipment), arising due to an act or omission of ~~as a result of~~ the Company (or any person / party acting on behalf of or under instruction of the Company) in connection with the relocation of metering equipment pursuant to the terms of this Clause 25 ~~acting contrary to Good Industry Practice in relocating the metering equipment under Clause 25.25.~~ This indemnity shall not be subject to any cap on liability.

Company	**Confidential/ Anonymous**	6) Are there any other concerns in relation to moving a PPM?
British Gas	Non-confidential	Our main concern is if there is an issue during the movement that causes an off-supply scenario for which an emergency job would be needed to get the customer back on supply. We accept this may be low probability.
Drax Group (Opus Energy and Haven Power)	Non-confidential	No additional comments at this time.
Electricity North West	Non-confidential	PPMs should only be moved where the Supplier has confirmed the move will not cause any issues with the credit availability.

Northern Powergrid (Northeast) plc and Northern Powergrid (Yorkshire) plc	Non-confidential	If credit can be 'lost' on a PPM when de-energising the supply, information will need to be provided to the DNO to allow it to inform the customer of the customer's next steps in that respect. Though the consultation references that PPMs are designed to prevent loss of functionality, we would like assurances that this is the case for all PPMs. Notwithstanding the training required for a DNO's operative to identify the outstanding credit on a PPM, the data will presumably be captured in the data flow so account needs to be made for it when creating the new/updated data flow.
SP Distribution and SP Manweb	Non-confidential	No (although important that we have a process/systems to capture data)
	Confidential	Yes, the potential for a loss of credit on the PPM resulting from a move, therefore a Customer being adversely impacted by said loss, or the potential for conflict arising which could be aimed at the staff engaged with the activity.
UKPower Networks	Non-confidential	Not really – the meters are designed to be able to be turned on and off without loosing information. but have agreed in the process to capture the levels of credit before turning off and add to job notes. For smart meters the supplier will already be aware.
Utilita Energy LTD	Non-confidential	We acknowledge that as said in the consultation document that meters are designed to turn off and on without loss of functionality. However, there are exceptions including meter damage or commissioning errors when re-installing. Prepayment customers are more likely to be financially vulnerable, and so any errors with maintaining the balance could leave a customer at risk of self-disconnection and they may not have the financial means to restore their supply. When we exchange a meter, we will record (normally with a photograph) the balance and final reading, ensuring the customer's credit is protected in the event of a mistake or error when commissioning the meter. The DNO engineer must also follow this process, or in the event that a customer's balance is lost their supplier will have no information to be able to investigate and verify the credit to return it to them.

Western Power Distribution	Non-confidential	Only concern would be signal strength and the customer being able to top up successfully after work complete. This is no different with any party moving meters though.
SSE Energy Supply Ltd	Non-confidential	No

Company	**Confidential/ Anonymous**	7) Do you believe the surveyor proposals detailed in Section 4.21-4.22 would adequately reduce the current post service alteration communication risks? If not, what else would reasonable be appropriate at the surveyor stage?
British Gas	Non-confidential	Yes
Drax Group (Opus Energy and Haven Power)	Non-confidential	Using the IHD to perform a signal check at the proposed new meter location will not indicate if there is a network WAN signal there. It will only indicate if it can pick up the HAN signal from the current comms hub and meter location and is therefore not a sufficient signal check. Also, as a non-domestic supplier, we do not provide IHDs for our installations so these devices will not be available for the test. The DNO will need to use a signal checker like the MOPs do at the proposed new meter location site, to see if WAN and the O2 signal is available there.
Electricity North West	Non-confidential	The customer chooses to have a meter/IHD relocated and the Supplier is responsible for communications/connectivity should the meter be relocated.
Northern Powergrid (Northeast) plc and Northern Powergrid (Yorkshire) plc	Non-confidential	We are unsure as to what this will achieve. The IHD communicates with the electricity meter for information on both the electricity and gas meters. Testing the IHD at the new service position will only confirm if the IHD will communicate with the electricity meter in its current position – not its new one. Also, the test will not confirm if the electricity meter in its new position will communicate with the gas meter in its existing or potential new position. Smart meter HAN connectivity is not generally part of the consideration of electricity service alteration locations currently so additional guidance on likely connectivity ranges and known issues would be useful. If there are devices on the market to test WAN/HAN connectivity and signal strength, this would also be useful.

SP Distribution and SP Manweb	Non-confidential	SPEN don't have surveyor or UKPN structure – process & resource changes would be required.
	Confidential	A physical survey may not always be necessary and could lead to a delay in completing the meter move from a Customer perspective, but in principle would agree this may help to mitigate the risk of communication failure when the assets are eventually relocated.
UKPower Networks	Non-confidential	The surveyors are key to making this work and to provide the customers with the options available . The option to promote the installation of smart at the same time is very much included and it also provides the opportunity to add value / intelligence in to the impacts on Han & Wan
Utilita Energy LTD	Non-confidential	We believe in addition to the use of the IHD to mitigate this risk, common sense advice could also be given, this would include. • Checking how many walls are between meters. • Moving meter to a basement. • Moving meter inside/outside.
Western Power Distribution	Non-confidential	Think they are appropriate for the task as many suppliers do not attend first and survey to install prior to an initial smart install.
SSE Energy Supply Ltd	Non-confidential	No. It should be added that if there is no IHD at site then the Distributor surveyor must refer the customer back to contact their Supplier and coordinate attendance for the meter move following service alteration by the Distributor. Without an IHD the surveyor cannot carry out the HAN connectivity/ communication test so should not offer to move the meter. Note that IHDs are not mandated for non-domestic customers, so many will not have them.

Company	Confidential/ Anonymous	8) Do you believe the jointer pre and post smart meter connectivity checks detailed in Section 4.23-4.24 are adequate? If not, what else would reasonable be appropriate at the jointer stage?
British Gas	Non-confidential	Yes
Drax Group (Opus Energy and Haven Power)	Non-confidential	Yes, these checks appear adequate as long as sufficient training is provided, including regarding the fact that connectivity times can vary significantly between regions.
Electricity North West	Non-confidential	We are concerned about carrying out smart meter connectivity checks when we are not smart meter experts. However, with training it might be technically possible but could be burdensome.
Northern Powergrid (Northeast) plc and Northern Powergrid (Yorkshire) plc	Non-confidential	What test will be required in 4.23 prior to the service alteration? As stated in Q7, using the IHD would not achieve the required result so a device would be needed to test or we would need to use guidance information to determine the likely outcome. In 4.24 it refers to the Distributor needing to ensure the connectivity functions are in use after the meter move. The Distributor cannot ensure this so should not be responsible for any connectivity issues that may arise following a meter move.
SP Distribution and SP Manweb	Non-confidential	Yes – however checks should only be restricted to the electricity meter and not the gas meter too
	Confidential	Yes, such tests should be sufficient.
UKPower Networks	Non-confidential	The connectivity indicators are pretty simple and a good view of pre and post connectivity of Han Wan Gas IHD.
Utilita Energy LTD	Non-confidential	In addition to a check on the lights of the smart meter, the IHD/PPMID (when available) should be used to check connection to both the gas and electric meters to determine if there is a HAN connection.

Western Power Distribution	Non-confidential	As long as the distributor staff attending to undertake the meter move are trained appropriately as any other smart meter installer then the function should work.
SSE Energy Supply Ltd	Non-confidential	Yes

Company	**Confidential/ Anonymous**	9) Are there any other topics that should be included in the Surveyors, Jointers and operation auditors training that is not included in the list under Section 4.25 of this consultation?
British Gas	Non-confidential	n/a
Drax Group (Opus Energy and Haven Power)	Non-confidential	No additional comments at this time.
Electricity North West	Non-confidential	It would be useful to consider legacy meters in the training, as we would expect to have to provide a leaflet for this type of meter either with the quotation or to leave on site with the customer. There is also a concern on how the training would be achieved as we understand there are a variety of smart meter manufacturers with different specifications/products.
Northern Powergrid (Northeast) plc and Northern Powergrid (Yorkshire) plc	Non-confidential	Known connectivity issues e.g. building construction and materials, distances, interference. A guide on what to do in the event of…… e.g. connectivity problems, credit transfer, customer electrical installation issues etc. What format will the training take? Who will do it? Who will pay?Notwithstanding the training required for a DNO's operative to identify the outstanding credit on a PPM, the data will presumably be captured in the data flow so account needs to be made for it when creating the new/updated data flow.
SP Distribution and SP Manweb	Non-confidential	No

	Confidential	Nothing identified at this time.
UKPower Networks	Non-confidential	None noted
Utilita Energy LTD	Non-confidential	We agree that in addition to general practical and competency training the training laid out in section 4.25 will be adequate.
Western Power Distribution	Non-confidential	Distribution staff undertaking meter moves will need to have internal training to national standards and appropriate field checks to suit the task.
SSE Energy Supply Ltd	Non-confidential	Meter Operators (MOPs) would be best placed to advise whether there are any other training considerations that could be made from a safety/ electrical competency perspective.

Company	**Confidential/ Anonymous**	10) Is this adjustment to current auditing arrangements considered adequate to manage any risks?
British Gas	Non-confidential	Yes.
Drax Group (Opus Energy and Haven Power)	Non-confidential	No additional comments at this time.
Electricity North West	Non-confidential	As the work being carried out is minimal we do not expect the current DNO audit arrangements to change, subsequently ensuring there's no need for any Parties to incur any additional costs.
Northern Powergrid	Non-confidential	MOCOPA will shortly be under REC governance so RECCo will need to be consulted to allow the governance panels to decide. DNO internal audit process will have to cover this activity – as they do now for other metering

(Northeast) plc and Northern Powergrid (Yorkshire) plc		related work e.g. re-terminating / re-placing meter tails following a cut-out replacement. DNOs are not audited on site by MOCOPA currently so this may be just an addition to the known metering work conducted and monitored under DNO internal audit processes.
SP Distribution and SP Manweb	Non-confidential	No – Supplier to undertake audits on meter moves conducted by Distributor
	Confidential	The proposed adjustments would seem to be reasonable.
UKPower Networks	Non-confidential	The new process will require the auditors to be trained in expectations and is key to the success – The requirements will enable reporting on the auditing to MOCOPA
Utilita Energy LTD	Non-confidential	It is our view to suitably manage risk, the view of MOCOPA should be sought after regarding the need for further audit requirements.
Western Power Distribution	Non-confidential	Yes
SSE Energy Supply Ltd	Non-confidential	As above, MOPs would be best placed to advise.

Company	**Confidential/ Anonymous**	11) Does the approach described in Section 4.28 adequately support the Supplier smart meter programme?
British Gas	Non-confidential	We disagree that this supports the supplier smart meter programme. Where a conventional meter is in situ, if a supplier were carrying out the work, they could take the opportunity to refit a smart meter.
Drax Group (Opus Energy	Non-confidential	We believe that Q11) should reference Section 4.27 in line with the consultation.

and Haven Power)		We agree that the approach described in Section 4.27, where Legacy meters are moved, the same guidance applied to Smart Meter moves should be followed to ensure that any future installation of a Smart Meter can successfully facilitate working with the HAN and WAN facilities. We agree that a Legacy meter should only be moved by the Distributor when a customer expressly refuses a Smart Meter. We are supportive of this proposal and with the above approach because the improved customer experience should outweigh any risks. However, suppliers sometimes use a site visit such as that described under this proposal to carry out a meter exchange. Numbers that would fall into the scenario that DCP383 covers should be very low but there could be a very small impact on numbers of SMETS2 meters installed as a result.
Electricity North West	Non-confidential	We support the smart meter programme and would leave the new service position 'smart ready'. However, we would not check any connectivity associated issues or requirements. At the quotation stage if a customer expresses a wish for a smart meter to be installed we would advise the customer to contact their Supplier, which provides the Supplier with the choice of whether to attend during the service alteration or after.
Northern Powergrid (Northeast) plc and Northern Powergrid (Yorkshire) plc	Non-confidential	The section in the consultation is 4.27! The section in the paragraph "the meter move would be free of charge" could be misinterpreted that the service alteration (including the meter move) is free of charge – which of course it isn't. This should be made clear in the guidance. This approach could help the smart programme if it prompts the customer to have a smart meter fitted in place of a legacy meter during the service alteration. However, as the DNO will not be replacing the meter type it would need either the meter operator to fit the smart meter during the service alteration or do so on a follow-up visit. Therefore, this change proposal is likely to have only a limited impact to support the smart meter programme.
SP Distribution and SP Manweb	Non-confidential	(No comment made)
	Confidential	As far as it is practical to do so, we believe it does.

UKPower Networks	Non-confidential	A key part of the proposal is keeping the supplier in the loop and allowing them to step in in respect of the customer relationship – the proposal seeks to advise the supplier before of the service alteration of the intent to move the meter and confirmation after the meter move so the records can be updated.
Utilita Energy LTD	Non-confidential	We believe the approach given supports the smart meter program as much as is possible within the scope of this modification.
Western Power Distribution	Non-confidential	The distributor must notify the supplier that the customer is looking for an alteration of meter position with a legacy meter and offer them to engage with the customer to see if they can install a smart meter.
SSE Energy Supply Ltd	Non-confidential	Yes. However it would support the programme more if, when a legacy meter move is requested, it is mandatory that a smart meter replacement is always recommended ahead of offering the legacy meter move.

Company	**Confidential/ Anonymous**	12) Do you agree that the information proposed to be sent to the Supplier, pre and post meter move is sufficient? If not, what else should be provided?
British Gas	Non-confidential	Yes.
Drax Group (Opus Energy and Haven Power)	Non-confidential	Yes.
Electricity North West	Non-confidential	As we deal with the customer, we would not expect under this change proposal to have any interaction with the Supplier should a meter move be carried out as part of a service alteration.
Northern Powergrid (Northeast) plc and Northern	Non-confidential	One of Ofgem's objections in DCP037 was that the supplier did not have the opportunity to object/refuse the particular meter move by the DNO so there would need to be a suitable lead time agreed in the pre meter move notification to allow for opt out.

Powergrid (Yorkshire) plc		Confirmation of the date of meter move post event will also be required. Under the Electricity Act it is the responsibility of the supplier to determine the meter position. Therefore, if the DNO was to move the meter they would need to receive instruction from the supplier (in the similar way to a meter operator receiving instruction from the supplier currently). This may need to be factored in to the data flow solution.
SP Distribution and SP Manweb	Non-confidential	Yes
	Confidential	Yes, however we are of the firm opinion that new data flows would need to be drafted, agreed and implemented, to facilitate the exchange of information.
UKPower Networks	Non-confidential	The data proposed is limited to the pertinent information required. Data quality can always be an issue, and anything sent will need quality checks.
Utilita Energy LTD	Non-confidential	We believe that the give information listed in section 4.28 of the consultation document is sufficient for the operation of this new process. However, we would ask that a process is defined to give a time frame for how far in advance (minimum) and how long after (maximum) this information can be sent to supplier.
Western Power Distribution	Non-confidential	Yes
SSE Energy Supply Ltd	Non-confidential	The process could be improved further for the customer if the supplier is always informed of the service move date/ appointment, regardless of whether the Distributor is also moving the meter. This would support the customer in coordinating the works between Distributor and Supplier/ MOP in the 'as is' process/ where the customer chooses or situation requires that the Supplier move the meter.

Company	Confidential/ Anonymous	13) Use of a data flow to pass on the relevant information to the Supplier will require an MRA change which cannot be progressed until at least September 2021. Do you agree that as an interim solution, the Supplier should provide Distributors with contact information to submit the information?
British Gas	Non-confidential	It is preferable to await the relevant dataflow changes as an interim solution would require manual effort
Drax Group (Opus Energy and Haven Power)	Non-confidential	No. Although we are supportive of the proposal, our preference would be to wait until a robust DTC solution can be implemented even if it that means postponing implementation. There is a risk with interim solutions, such as use of emails, that they do not provide a clear audit trail and there is potential for updates to be missed or actions delayed.
Electricity North West	Non-confidential	If this change were to be implemented, we appreciate the proposed interim solution, but will it work in practice as we have seen issues with contact information being provided to populate the Supplier Emergency Metering Service Provisions Register following the implementation of DCP 364 'Provision of Information on Suppliers Emergency Metering Service Provisions', so a dataflow would be our preference.
Northern Powergrid (Northeast) plc and Northern Powergrid (Yorkshire) plc	Non-confidential	No. An interim work around solution would be messy and prone to error. It is already mid-July 2021 so an interim solution would be short lived anyway. It would be better to wait until a REC change can happen. Development work on a new data flow can presumably begin to speed up the process when REC changes can take place.
SP Distribution and SP Manweb	Non-confidential	If necessary, then the temporary solution will work – it is likely this CP will not come into effect until after September 2021 so a data flow needs to be progressed
	Confidential	Although we understand the reasons for proposing an interim solution, in our opinion we believe that the MRA change should be completed prior to rolling out this DCP, if and or when it is agreed.

UKPower Networks	Non-confidential	The transition will require some pragmatic steps to make the transition workable. And we will review at supplier meetings.
Utilita Energy LTD	Non-confidential	To be able to answer this question more information is required: • How long will this process be operational before a change can be implemented within REC? • What is the volume of service alterations we can expect within that time frame? Without knowledge of the above it is impossible to quantify the impact a manual interim solution would have.
Western Power Distribution	Non-confidential	Yes
SSE Energy Supply Ltd	Non-confidential	SSE Energy Supply Ltd

Company	**Confidential/ Anonymous**	14) Do you believe that this mitigation adequately covers the issues previously highlighted by Ofgem?
British Gas	Non-confidential	Yes.
Drax Group (Opus Energy and Haven Power)	Non-confidential	Yes.
Electricity North West	Non-confidential	Ofgem supported the intention to formalise a uniform process for meter relocation work undertaken by Distributors (requiring only one visit to a Customers premises) but highlighted that under the “supplier hub” principle, Suppliers not Distributors were placed at the centre of metering arrangements with the primary responsibility for meter provision and maintenance.

Northern Powergrid (Northeast) plc and Northern Powergrid (Yorkshire) plc	Non-confidential	The five bullet points in section 4.33 are a summary of Ofgem's concerns to the previous DCPs and an attempt has been made to mitigate them within DCP 083. Some of the processes may need a little more detail to convince Ofgem but ultimately Ofgem will decide this.
SP Distribution and SP Manweb	Non-confidential	Yes
	Confidential	Yes, it appears to be the case.
UKPower Networks	Non-confidential	As part of the proposal development we reviewed the ofgem feedback on previous requests and sought to mitigate each of the issues raised. We have since considered the OFGEM feedback with each individual point with the work group and discussed the appropriateness of the mitigation which we believe adds value to all parties . Uppermost is the supplier hub principle which allows the suppliers the control to restrict the operation if this suits them in the future. The liability was an issue here too which was added with the pervious access to meters CP The MAP / MAM considerations on access with Distributors considered too and agreed in previous CP as precedent.
Utilita Energy LTD	Non-confidential	We believe the mitigations listed in section 4.33 are adequate, pursuant to our answer to question five regarding liability being addressed.
Western Power Distribution	Non-confidential	Yes
SSE Energy Supply Ltd	Non-confidential	Yes, but there is potential for the scope definition to change outside the formal change process which may cause some parties and Ofgem concern.

Company	Confidential/ Anonymous	15) Do you consider that the proposal better facilitates the DCUSA General Objectives? If so, please detail which of the General Objectives you believe are better facilitated and provide supporting reasons.
British Gas	Non-confidential	The proposal better facilitates DCUSA objectives 2 and 4.
Drax Group (Opus Energy and Haven Power)	Non-confidential	Yes. We believe that the proposal better facilitates DCUSA General Objectives 1, 3 and 4: Objective 1 'The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks' – During the COVID-related furlough, Distributors have assisted with meter-moves where supplier/meter operator staff have been unable to co-ordinate with Distributors. This approach has enabled the opportunity for a one stop shop, improving the customer experience by reducing the time that the customer is off supply and has enabled improved coordination in disconnecting redundant services, avoiding the need for additional visits and cost. In order to maintain and build upon these efficiencies, it would appear sensible to continue this one stop shop approach as an enduring process. Objective 3 'The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences' – The reduced need to coordinate separate appointments with the supplier and the customer should enhance efficiency for DNO and IDNO Parties enabling resources to be more focused on new installs. Objective 4 'The promotion of efficiency in the implementation and administration of the DCUSA' - The facility improves the efficiency of the de-energisation and re-energisation process between the distributor and supplier and for the customer avoiding extended timeframes and delays to the job linked to the coordination of separate appointments.
Electricity North West	Non-confidential	From a customer perspective this change proposal could provide a 'one stop shop', resulting in efficiencies in the process and potentially saving a Supplier visit, but for industry it has the potential to blur the clear lines of responsibility under the 'supplier hub' principle, which would not better facilitate the DCUSA General Objectives.

Northern Powergrid (Northeast) plc and Northern Powergrid (Yorkshire) plc	Non-confidential	Yes. General Objective 4. The CP seeks to add efficiency to the service alteration journey by simplifying the process with customer service and experience at the heart of the proposal.
SP Distribution and SP Manweb	Non-confidential	We agree that the proposal better facilitates General Condition 2 and 4 for the reasons given in the consultation document.
	Confidential	No comment.
UKPower Networks	Non-confidential	Yes the proposal in proves the customer service and the operation and maintenance of the distribution network – it has a safety impact too in improving the facility to disconnect idle services with a more efficient interface and reconnection – reduced idle services left on site.
Utilita Energy LTD	Non-confidential	We agree with the objectives highlighted as having a positive impact within the consultation document.
Western Power Distribution	Non-confidential	Yes, General objective 4 as if work is completed in one visit by the DNO then this is more efficient for the customer and parties involved.
SSE Energy Supply Ltd	Non-confidential	No, the proposal does not particularly demonstrate any better facilitation of the DCUSA General objectives. There is potential positive impact to consumer experience, but no quantifiable cost benefits to the customer have been included with the CP.

Company	**Confidential/ Anonymous**	16) Are you aware of any wider industry developments that may impact upon or be impacted by this CP?

British Gas	Non-confidential	None.
Drax Group (Opus Energy and Haven Power)	Non-confidential	No.
Electricity North West	Non-confidential	No.
Northern Powergrid (Northeast) plc and Northern Powergrid (Yorkshire) plc	Non-confidential	No.
SP Distribution and SP Manweb	Non-confidential	No
	Confidential	Nothing identified.
UKPower Networks	Non-confidential	If the CP is agreed the next steps would be to agree and enable data flows to be used with the MRA – there are existing flows but could develop some dedicated flows for this activity if felt required.
Utilita Energy LTD	Non-confidential	As mentioned in our answer to question three, An ALT HAN solution must be considered as the Bridge 1 device will be installed between the meter and main fuse and will need to be moved alongside the meter. There is also an approved industry change proposal within BSC, P375. This modification will see multiple meters at one site behind the boundary meter (ASMIDS). Where these sites are encountered consent of the registered Virtual Lead Party would need to be sought after before moving their assets.

Western Power Distribution	Non-confidential	No
SSE Energy Supply Ltd	Non-confidential	With the implementation of Market wide Half Hourly Settlement (MHHS), there may be risk of bigger impacts to settlement if there are increases in communication issues due to smart meter moves (regardless of which party moves the meter). Arguably the Meter Operator (MOP) as Supplier Agent has more scope to get the communications working again quickly if they have completed the meter move rather than the Distributor.

Company	**Confidential/ Anonymous**	17) Are you supportive of the proposed implementation date being the first DCUSA release following Authority approval?
British Gas	Non-confidential	We would support an implementation once all elements are met such as the data flow change
Drax Group (Opus Energy and Haven Power)	Non-confidential	No. Required lead times for implementation will depend upon the solution that is selected. For example, if as outlined in the proposal, new or amended DTC flows are required, and with changes implemented post-September 2021 due to transition to the REC, we would recommend a minimum lead time of six months following Authority approval.
Electricity North West	Non-confidential	Yes, this seems a reasonable approach to take for implementation.
Northern Powergrid (Northeast) plc and Northern Powergrid (Yorkshire) plc	Non-confidential	Yes.

SP Distribution and SP Manweb	Non-confidential	Yes.
	Confidential	No, see our response to Question 13.
UKPower Networks	Non-confidential	Yes – prefer this to be implemented promptly following approval of the change.
Utilita Energy LTD	Non-confidential	Subject to the uncertainties we have set out in question 13 we are not able to support the implementation date being the first DCUSA release which is likely to be November 2022.
Western Power Distribution	Non-confidential	Yes
SSE Energy Supply Ltd	Non-confidential	No. We believe it is essential that automated data flows must be utilised in the update communications between DNOs, Suppliers, MOPs and DCs, not an interim manual solution which would be resource intensive and risk data errors. New data flows/ amended data flows cannot be proposed until REC go-live in September 2021, therefore it is unreasonable to expect that these could be ready to be utilised as early as the next DCUSA release in November 2021. We would suggest June 2022 as the earliest suitable release date in order to introduce the new/ amended flows required

Company	**Confidential/ Anonymous**	18) Do you have any comments on the proposed legal text?
British Gas	Non-confidential	No.
Drax Group (Opus Energy and Haven Power)	Non-confidential	No additional comments at this time. .

Electricity North West	Non-confidential	We believe the legal text will deliver the intent of this change proposal.
Northern Powergrid (Northeast) plc and Northern Powergrid (Yorkshire) plc	Non-confidential	Please see our comments in Attachment 4 DCP 383 Legal Text - NPg.
SP Distribution and SP Manweb	Non-confidential	No
	Confidential	None.
UKPower Networks	Non-confidential	We believe this adequately covers the inclusion of this work and apportions the liability responsibly and in line with other elements of DCUSA where meter operators or distributors interface and operate with others assets.
Utilita Energy LTD	Non-confidential	Our answer to question five outlines out concerns around the provisions for liability within the proposed legal text, if this is not remedied the clause regarding indemnity provides suppliers with no assurance. Indemnity has also been limited solely to MAP charges incurred, whilst these are relevant it is not exhaustive of the potential costs incurred by suppliers.
Western Power Distribution	Non-confidential	No
SSE Energy Supply Ltd	Non-confidential	Please see our answer to Question 5 for our comments and suggested drafting of the proposed additional Clause 25.32.

Company	**Confidential/ Anonymous**	19) Any other comments?

British Gas	Non-confidential	It is preferable that a procedure is 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.
Drax Group (Opus Energy and Haven Power)	Non-confidential	No additional comments at this time. .
Electricity North West	Non-confidential	No further comments to add.
Northern Powergrid (Northeast) plc and Northern Powergrid (Yorkshire) plc	Non-confidential	Moving meters during service alterations is likely to be a substantive change from existing ways of working for most DNOs. SLC29 says that Distributors must not conduct any business or carry out any activity other than an activity of the Distribution Business except in certain circumstances e.g. we have the Authority's consent to do so or it is De Minimis business. The DNOs will, therefore, have to be comfortable that they can carry out this work in compliance with SLC29. Under the Electricity Act the Supplier has the responsibility to determine the position of the electricity meter. To facilitate this requirement we have suggested a change to clause 25.25 in the legal text, which we think should be sufficient for it to be the Supplier determining the meter position i.e. confirming that the DNO can move the meter to the new Entry/Exit Point. Please see our comments in Attachment 4 DCP 383 Legal Text – NPg. In paragraph 4.17 (Charges) it refers to a customer with a disability potentially receiving the meter move free of charge. We presume this has been included to account for the Supplier's responsibility to determine the meter position and, if that position has to be changed or the meter itself has to be replaced with an adapted one to meet the needs of a disabled person, the supplier has to do so without charging that person. That obligation is in respect of disabled people only so it doesn't extend to all "vulnerable" customers e.g. those customers who are on the PSR for other reasons. As the Supplier has responsibility for the position of the meter the Supplier should fulfil its responsibility under the Electricity Act and in accordance with the requirements of the Equality Act and bear the costs of doing so,

		which would include the cost of moving the DNO assets. Therefore, in the circumstances described in 4.17 the Supplier will have to bear the DNO costs for the service alteration. This has been accounted for in the suggested additional text of Clause 25.26.
SP Distribution and SP Manweb	Non-confidential	None
	Confidential	None.
UKPower Networks	Non-confidential	Following on from the RFI we believe there has been a very good review with the suppliers supporting the methodology and process that will enable smart meter moves – It has been a very positive work group with support from the DNO's and suppliers which we trust will provide a successful journey.
Utilita Energy LTD	Non-confidential	We have no further comments.
Western Power Distribution	Non-confidential	I understand why the proposer is putting in this change, but realistically this is only because the supplier parties are currently not providing the service in a timely manner to their customers. It also needs to be made clear to supplier parties that DNO's have the right not to undertake this work and if requested they need to offer their customers a timely visit.
SSE Energy Supply Ltd	Non-confidential	(No entry)