DCUSA Change Report	At what stage is this document in the process?
# DCP 383 ## Provision for Distributors to Move Meters for Service Alterations ***Date raised:*** ***10 February 2021*** ***Proposer Name:*** ***Paul Morris*** ***Company Name:*** ***UKPN*** ***Company Category:*** ***DNO***	01 – Change Proposal 02 – Consultation **03 – Change Report** 04 – Change Declaration

Purpose of this Change Proposal:

This Change Proposal seeks to define a process detailing when a Distributor can move a Supplier's meter during service alteration works.

This document is issued in accordance with Clause 11.20 of the DCUSA, and details DCP 383 – 'Provision for Distributors to Move Meters for Service Alterations.

Parties are invited to consider the proposed amendment (Attachment 1) and submit their votes using the Voting form (Attachment 2) to dcusa@electralink.co.uk by **12 November 2021.**

The voting process for the proposed variation and the timetable of the progression of the Change Proposal (CP) through the DCUSA Change Control Process is set out in this document.

If you have any questions about this paper or the DCUSA Change Process, please contact the DCUSA by email to dcusa@electralink.co.uk or telephone 020 7432 3011

Impacted Parties: Supplier parties, DNO parties, IDNO parties

Impacted Clauses: Introduction of a new Clause 25.25 to 25.32 and a new Schedule 25.

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Timetable

The timetable for the progression of the CP is as follows:

Change Proposal timetable

Activity	Date
Initial Assessment Report Approved by Panel	17 February 2021
Consultation issued to Parties	30 June 2021
Change Report approved by Panel	20 October 2021
Change Report issued for Voting	22 October 2021
Party Voting Ends	12 November 2021
Change Declaration issued to Authority	16 November 2021
Authority Decision	December/ January 2021
Implementation	Next DCUSA release following Authority decision (24 February 2022)

Any questions?

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1 Executive Summary

What?

1.1 This proposal is to include provision in the DCUSA to provide a facility for licensed Distributors to move whole current meters (agreed as in scope) as part of customer requested works to alter the service position.

1.2 DCUSA (under clauses 25.23 and 25.24) allows Distributors to remove and replace meters as close as reasonably practicable to the original position and this request would extend this facility to allow a trained service alteration craftsperson to reposition the meter and associated equipment to a new service position as requested by a customer.

1.3 The proposal will require communication to Suppliers advising when the appointment is made via a data flow through the Data Transfer Network (DTN)) and this should also be followed up with a flow facility to update Suppliers of the activity undertaken and confirmation of the new meter location. Consideration is needed as to whether these would need to be new data flows or whether the use of an existing data flows would be appropriate. It has been noted that with Master Registration Agreement (MRA) moving into the Retail Energy Code (REC), there has been a freeze on non-essential changes until September 2021 and therefore any development of a new data flow would be delayed until after this date.

1.4 The provision will allow:

a) For the Distributor to move meters as part of the service alteration, where they have appropriately trained resource and offer the service.

b) The Supplier / meter operator will facilitate the meter move if the customer prefers. This option must be communicated to the customer.

c) Where the Distributor chooses not to provide the meter move service, the Supplier will, at the customer's request, arrange to move the meter in coordination with the Distributor's service alteration work.

d) Where the Supplier believes it necessary to carry out the meter move work itself it shall notify the Distributors in writing in advance not to provide this service to their customers, on a 'universal' basis.

1.5 This CP covers whole current meter changes, that are not deemed complex within the included scope table within Section 4.37 below.

Why?

1.6 When customers request a service alteration, the coordination / planning of the physical service alteration and the attendance of the Supplier on the same date to move the meter to maintain supply is often problematic for the customer. This causes lead times for attendance to impact on work dates, leading to customer frustration and negative results from the broad measure of customer satisfaction feedback.

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1.7 Service alterations carried out in the UK, include service cut backs, service diversions, and disconnection and new services. These are situations where moving the existing whole current meters (and associated metering equipment) as part of Distributor works can improve the level of service provided to the customer.

1.8 Since privatisation, some Distributors have carried out this activity where customers have not been successful in coordinating both Supplier and Distributor, and arrangements are not in place to maintain the metered supply facility. More recently, Distributors have agreed to assist with meter-moves while Supplier / meter operator staff were unable to co-ordinate with Distributors through COVID-related furlough, helping to reduce negative impact on customers and improve their experience.

1.9 Enabling this change will provide an opportunity for Distributors to offer a 'one-stop-shop' to customers for service diversions, significantly improving the customer journey through the service diversions process, potentially reducing overall costs and offering a choice of service.

How?

1.10 By updating DCUSA to provide a framework allowing for Distributors to move meters during service alterations. The framework will maintain the Supplier Hub Principles and seek to enhance the customer journey by allowing the possibility of a one shop stop.

2 Governance

Justification Part 2 Matter

2.1 This Change Proposal should be treated as a Part 1 Matter as it is likely to have a significant impact on the interests of electricity consumers and it is directly related to the safety or security of the Distribution Network.

Requested Next Steps

2.2 The Panel considered that the Working Group have carried out the level of analysis required to enable Parties to understand the impact of the proposed amendment and to vote on DCP 383.

2.3 The DCUSA Panel recommends that this CP:

- Be issued to Parties for Voting.

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3 Why Change?

Background of DCP 383

3.1 It is estimated that in an average year, there are circa 15-20K service alterations carried out in the UK. Where Distributors are both willing and trained to offer a meter-move service to the customer as part of service alteration works, there are opportunities to improve the customer journey by simplifying the coordination of attendance on site and minimising time off supply and the overall inconvenience and cost to the customer.

3.2 Customer feedback is the main driver for this CP, avoiding extended time frames and delays to the job linked to the coordination of separate appointments. Attachment 3 shows some customer feedback examples from service alterations. Having one team facilitate the alteration can enable resource efficiency and opportunities for cost reduction to the customer.

3.3 Where the customer chooses the Distributor to move the meter and has a legacy meter, at survey stage the Distributor will advise the customer of the opportunity to have a smart meter fitted by the Supplier instead.

3.4 Where customers require a service alteration for a smart meter, Suppliers currently have no input as to position and are left to manage both the WAN & HAN signal quality following customers' works. As part of service alteration surveys, Distributors can discuss with the customer the WAN & HAN implications of moving the service positions and seek to avoid unduly separating the gas and electricity meter locations.

3.5 Maintaining the 'supplier hub principle', the Supplier will receive pre and post notification of any meter move and would have the ability to opt-out of allowing Distributors to offer this service.

3.6 Increasing customer choice. The customer can choose a seamless 'one point of contact journey' for service alteration works; including this in the DCUSA enables customer certainty that the movement of the meter is formalised.

3.7 Consideration of other interested parties including MAP & MAM. DCUSA allows Distributors to take a meter off the wall and replace it and to tighten meter tails (25.23 & 25.24) and provides the precedent in respect to arrangements between Suppliers and the MAP / MAM.

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4 Solution

4.1 The DCUSA Panel established a Working Group to assess DCP 383. This Working Group consists of DNO, Supplier, IDNO and Ofgem representatives. Meetings were held in open session and the minutes and papers of each meeting are available on the DCUSA website – www.dcusa.co.uk.

4.2 The Working Group developed and issued a request for information (RFI) to gather information and feedback from industry and to aid them in refining the proposed solution. Details of the responses to this can be found in Attachment 4. A summary of the RFI can be found below:

RFI

4.3 The RFI sought initial feedback from industry to help the Working Group further define the solution ahead of this consultation. It asked for feedback in relation to what the customer journey should look like, and the feedback received has been used to demonstrate the customer journey below.

4.4 The RFI asked whether respondents believe the customer experience can improve with Distributors moving meters. A majority of respondents stated they did believe the customer experience can improve.

4.5 The RFI asked respondents how Distributors moving meters could support the Smart Meter programme, such as informing customers with legacy meters that they can contact their Supplier for a free smart meter installation. It also asked respondents how Distributors could ensure that a smart meter keeps its connectivity after a move. The Working Group have considered responses when reviewing this aspect as detailed later in this consultation.

4.6 Supplier respondents were asked what information they would need from Distributors undertaking a meter move during a service alteration, such as new meter location. These responses have been considered when reviewing this aspect of the solution.

4.7 The RFI asked respondents what their thoughts were on appropriate auditing of meter moves if this CP is approved. These responses have been considered when reviewing this aspect of the solution.

Industry Consultation

4.8 Following the RFI the Working Group developed further the proposed solution and issued an industry consultation. The full industry consultation, along with industry feedback can be found in Attachment 5.

4.9 The Working Group split out this CP into the following components and provided initial proposals on each in the consultation:

- Scope (what meters can a Distributor move)
- Governance if scope needs to change in future
- Customer Journey
- Charges
- Liability
- Prepayment Meters
- Smart Meter Communications
- Training

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- Audits
- Support to Smart Meter Programme
- Information to the Supplier
- Old CPs

4.10 The following sections 4.12 to 4.33 provide a summary of the key responses coming from the consultation in relation to the above subjects. Sections 4.34 to 4.90, provide the Working Groups final proposals after taking into consideration consultation responses.

4.11 Respondents were asked if they understood the intent of the CP and were supportive of the principles. All respondents understood the intent of the CP, and a majority were supportive of the principles. One respondent stated they were supportive of the principles from a customer perspective but not from an industry perspective.

Scope and Governance:

4.12 Respondents were asked whether they agreed with the Working Group analysis on what meters should be in and out of scope for this CP. A majority of the respondents agreed that the scope was appropriate. Further details of the scope and the agreed governance arrangements can be found in Sections 4.37 to 4.42.

Customer Journey:

4.13 A majority of respondents were supportive of the front-end process and delivery process detailed in the diagrams within the consultation documentation. There were a few minor suggested amendments and a comment regarding the MOP not being included in the original diagrams and this has now been updated as seen in Sections 4.43 to 4.45 below:

Liability:

4.14 Liability for Distributors if Supplier equipment is damaged was an important issue mentioned in the Ofgem responses to DCPs 019 ‘Moving meters with Service Alterations‘ and 037 ‘Moving Meters.’ A Clause regarding liability was introduced in to Section 2a (Clause 30.18) of the DCUSA by DCP 253 ‘Retightening and Remaking of Whole Current Metering System Terminal Connections’ stating the following:

“Where an incident arises in the course of the User (or its BSC Party Agent) or the Company undertaking work on (or in the immediate vicinity of) a Metering Point, and to the extent that it is reasonably necessary for the User and the Company to exchange information in order to resolve the incident, then the User and the Company shall exchange such information”.

4.15 DCP 383 seeks to include a specific reference to liability where Distributors move a meter as part of service alterations and within the consultation proposed the following legal text:

Proposed Additional Clause

The Company shall indemnify the User against all expenses, liability, loss or damage incurred by the User as a consequence of the User’s liability to the Meter Asset Provider for the Meter Asset Provider’s direct losses for physical damage to the metering equipment, as a result of the Company acting contrary to Good Industry Practice in relocating the metering equipment under Clause 25.25.

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4.16 Respondents were asked if they agreed that the liability would be adequately covered with the addition of the above Clause. Some respondents were comfortable with the proposed legal text, whilst others had some comments. One respondent was concerned that the new proposed clause did not cover costs associated with a customer complaint as a direct result of the Distributor acting contrary to Good Industry Practice in relocating the metering equipment and one respondent stated they would also expect this indemnity should be carved out from any liability cap.

4.17 The Working Group noted these comments and amended the proposed legal text. The legal text can be found in Attachment 1 and the exact section regarding liability is also covered in Sections 4.48 to 4.55 of this Change Report.

Prepayment Meters

4.18 The possibility of credit being lost on Prepayment Meters (PPM) through the meter move process was highlighted in discussions. Whilst meters are designed to be turned on and off without loss of functionality, the Working Group were advised that Meter Operators will record any credit on PPM before moving and Distributors should also capture the credit availability before moving the meter in the job notes as a backup if required.

4.19 Respondents were asked if there were any other concerns in relation to moving PPMs. One concern raised was regarding loss of connectivity. If this occurs the customer will not be able to top up and will go off supply once credit reaches zero. The Working Group acknowledged this and further details of how this should be addressed are detailed in Section 4.56 to 4.58.

Smart Meter Communications

4.20 In the consultation, the Working Group acknowledged that at present there is no signal strength checks when the service alteration position is agreed, and Suppliers are left to connect and manage. Therefore, there is an opportunity to significantly improve the customer communication around smart meter connectivity earlier in the process, with the surveyor providing advice to the customer to avoid the impacts of causing separation of the electricity and gas meters, the comms hub and the in-home display and moving where the WAN communications may be affected.

4.21 Generally, it was acknowledged that the proposed surveyor and jointer checks regarding smart communication will improve what currently happens now. It was noted within the consultation responses that there are signal checkers available on the market that can be used to check WAN/ HAN signals at the new position. It was agreed that this could be an option for Distributors but should not be made mandatory by this CP. Further details in relation to the Working Groups final comments on smart meter communications can be found in Sections 4.59 to 4.69.

Training

4.22 Most respondents agreed that the proposed training for surveyors and jointers identified in the consultation was adequate. It was noted that a guidance document for DCP 383 would be useful, for example detailing what smart connectivity checks should be done, how to do with PPMs etc. The final Working Group analysis regarding this area can be found in Sections 4.70 to 4.71.

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Audits

4.23 In the consultation, the Working Group considered how this activity could be audited and whether this should be included into the existing MOCOPA DNO audit process. DNO operational assurance teams will need to be trained to facilitate internal audits on the meter move activity and current Distributor MOCOPA audits would need to be added to in order to reflect this activity.

4.24 A majority of respondents were comfortable with the proposed training stated in the consultation. One respondent noted that Suppliers could audit the meter move and some suggested that auditing may be reviewed by REC. The final Working Group analysis regarding this area can be found in Sections 4.72 to 4.73.

Support Smart Meter Programme

4.25 In the consultation, the Working Group discussed that the Distributor could help with the smart meter rollout by informing customers with legacy meters that they can have a smart meter installed free by their Supplier. It was also noted that if the customer wanted their legacy meter moved the same guidance applied in 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.

4.26 In general, the respondents to the consultation were happy that this guidance to the customer was appropriate and would support the smart meter programme.

Information to the Supplier

4.27 In the consultation, the Working Group stated that the following information should be provided to the Supplier as part of a meter move during a Service Alteration:

- Provision of the date of the intended works/ appointment if Distributor to move meter
- Confirmation of the meter move, along with the Meter Serial Number and the location of the meter.

4.28 It was also noted that the intention was for a new data flow to be developed to allow for this information to be sent. It was acknowledged that this new data flow may take time for development and therefore it was proposed that as an interim solution where Distributors move meters as part of a service alteration Suppliers should advise of appropriate contact details so that the above information can be provided prior and after any meter move.

4.29 Generally, the respondents were comfortable with the proposed information that would be sent to the Supplier pre and post meter move. One respondent noted that the Supplier should always have a choice to decline a meter move. Further information regarding maintaining the Supplier Hub Principles can be found in Section 4.36.

4.30 Regarding the suggestion of an interim solution prior to an approved flow being put in place, the consultation responses provided mixed views. The final Working Group analysis regarding this area can be found in Sections 4.76 to 4.80.

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Old CPs

4.31 In the consultation, the Working Group noted that there had been two similar CPs raised and rejected by Ofgem previously:

- **DCP 019 and 019A 'Moving Meters with Service Alteration'**
- **DCP 037 'Moving Meters'**

4.32 In particular, the Working Group noted the reasons for the rejections of the above CPs. The feedback comments from previously rejected CPs have been captured and considered in terms of appropriate mitigation. Some of the mitigation added to this proposal include:

- Individual Suppliers facility to reject Distributor meter moves for service alteration.
- Distributors advise to Supplier before and after work is carried out with an opportunity to step in if required.
- Appropriate addition of legal text in relation to liability.
- Scope has clearly been defined in relation to what meters a Distributor can move during a service alteration.
- Permissions from asset owners such as meter asset owners has been reviewed and is supported with precedents in DCP 253.

4.33 Respondents were asked if they believe that this mitigation adequately covers the issues previously highlighted by Ofgem. All respondents were comfortable that these concerns have now been addressed with this CPs proposed solution.

Working Group Conclusions and Next Steps

4.34 The Working Group identified the following areas of further work having discussed the parties' responses to the first consultation and considered the proposed solution further:

- Create a document named "Distributor Meter Moves During Service Alterations Scope Document" detailing the what meters are in and out of scope for this CP.
- Update the front-end and delivery process diagrams detailing the proposed customer journey.
- Consider further and update the legal text in relation to liability.
- Update PPM guidance in relation to risk of loss of supply in event of connectivity being lost.
- Acknowledge that signal checkers are available to check smart meter connectivity – recommended not mandatory for this CP.
- Develop interim solution for providing information to the Supplier prior to an approved data flow.
- Develop a DCP 383 Guidance Document (Attachment 7).

4.35 The above points are captured in the final Working Group analysis in the following Sections.

Supplier Hub Principles and Distributor Choice

4.36 Maintaining the 'Supplier Hub Principle', the Supplier will receive pre and post notification of any meter move and would have the ability to opt-out of allowing Distributors to offer this service. The Distributor also has the choice as to whether they wish to offer this service to Suppliers and customers.

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Scope

4.37 This Change will apply to both Domestic and I&C customers, however the Distributor will only move services within their own licensed areas and will only move meters associated with the service move. After review, the Working Group agreed that the Distributors could only move meters within the 'in scope' section in the table below:

Domestic & Small Industrial Commercial	
In Scope Meters	**Out of Scope - Complex**
Whole Current Smart & Legacy 4 terminal Meters – Credit	5 Terminal Meters Off Peak load
Whole Current Smart & Legacy 4 terminal Meters – PPM	Meters with Separate Timeswitches
	Contactors for off-peak load
	Aerial linked comms hub
-	Whole Current 8 terminal Smart and legacy Three Phase meter
-	Whole Current Legacy with Gas first Comms Hub (in line or separate)

4.38 A document has been created called ""Distributor Meter Moves During Service Alterations Scope Document" (Attachment 6). This document details the above and it is proposed that this will be published on the DCUSA website. The following section details the governance of this document.

The governance arrangements needed to ensure there is a mechanism to allow for new metering arrangements and future amendments to the scope in relation to what meters can be moved by a Distributor.

4.39 The Working Group discussed how the scope in relation to what meters can and cannot be moved by Distributors would be governed if this CP is approved.

4.40 After discussion, the Working Group proposed that there should be a published guidance document which clearly details what meters are in and out of scope. This document will be referenced within DCUSA but DCUSA will not include details of the content so that any future changes can be amended, after agreement with the DCUSA Panel, without the need for a CP to be raised.

4.41 It was agreed that a process by which updates can be made to the guidance document would also be needed and that this process should be controlled by the DCUSA Panel who would review any request to alter the content of the guidance document as the need

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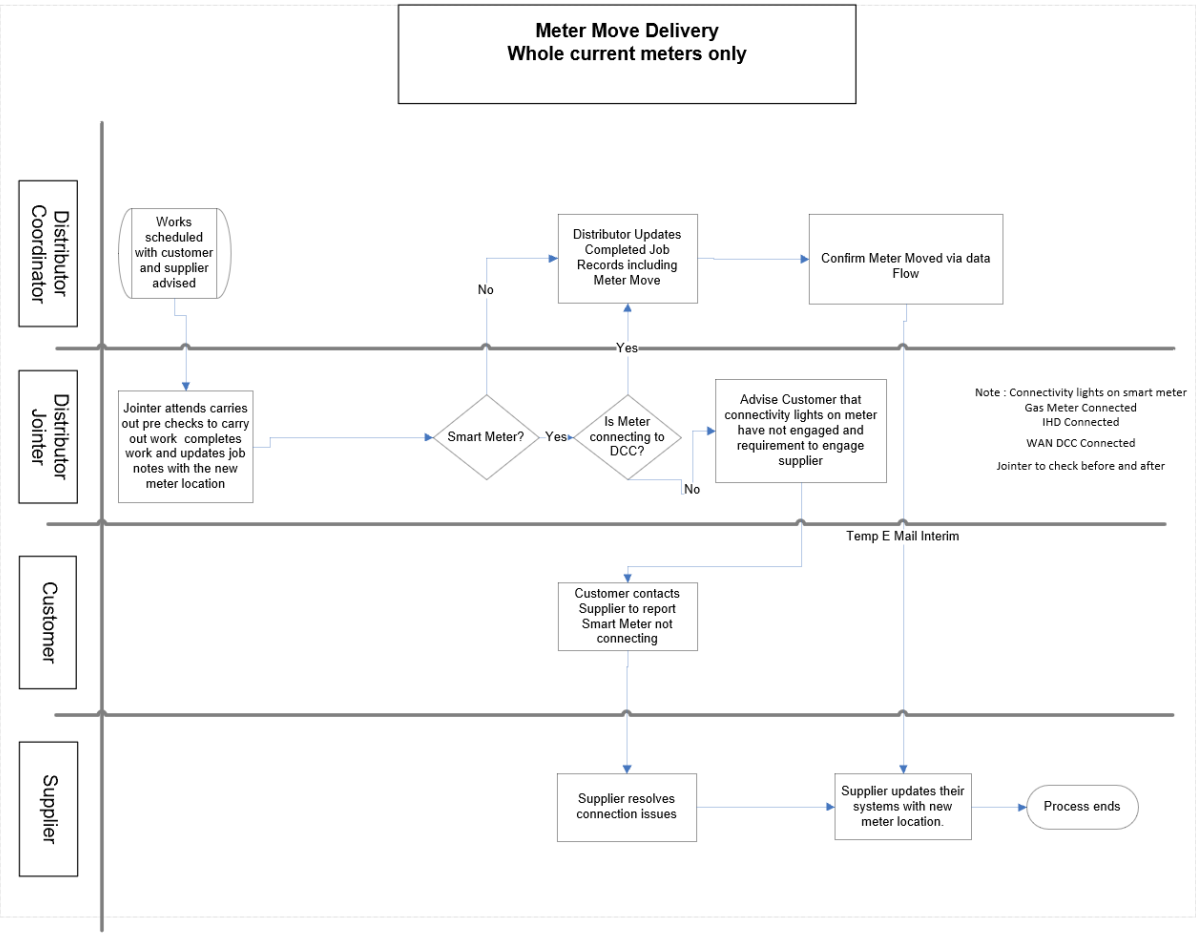
occurred, such as a new meter type entering the market or an existing meter type moving in or out of scope.

4.42 The legal text for DCP 383 is provided as Attachment 1 and contains the process by which proposed amendments can be put before the Panel, by a Supplier or Distributor, who will determine whether to accept the requested amendment and how this is communicated to Distributors and Suppliers and the wider market.

Customer Journey:

Front End Process

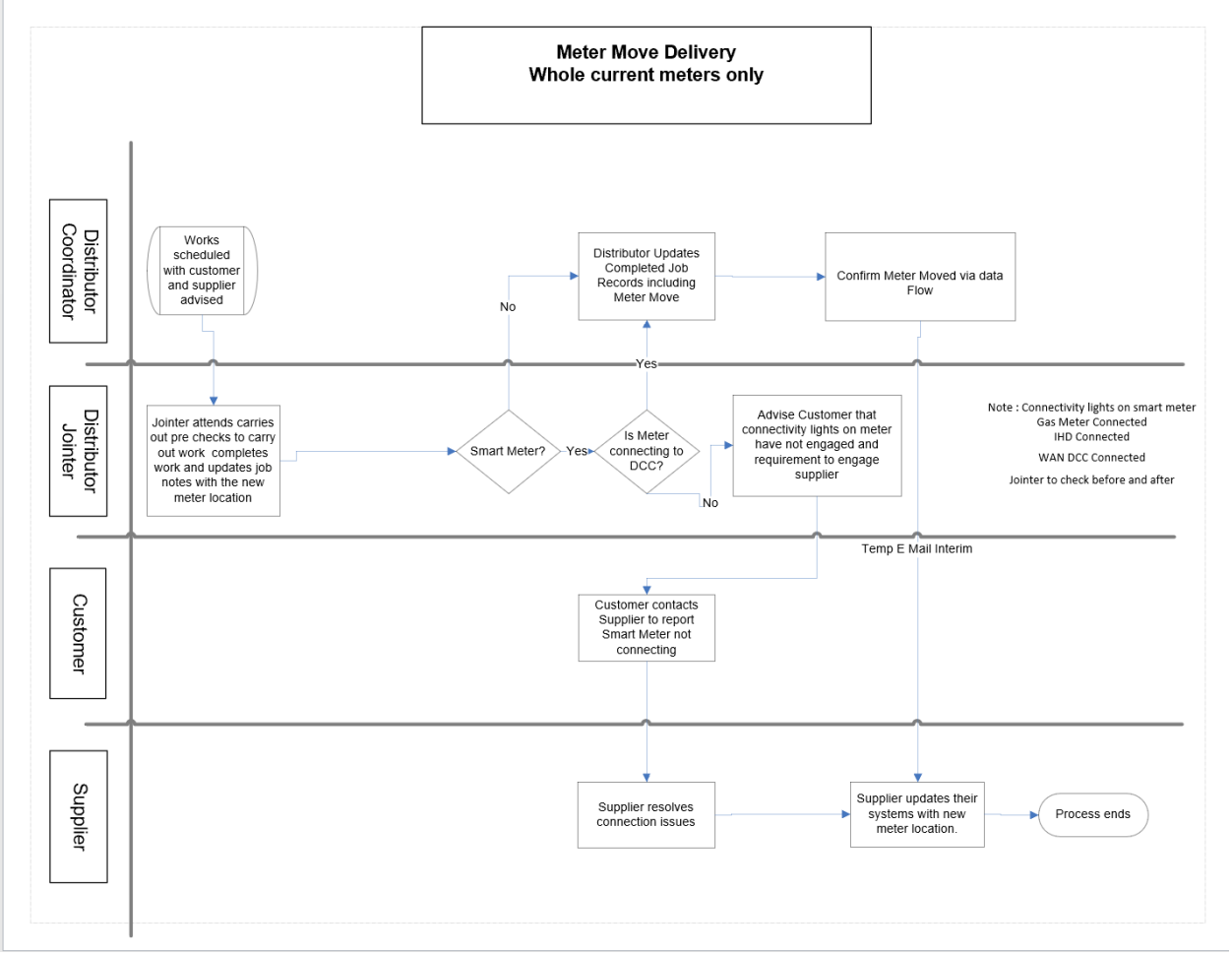
4.43 The Front-End Process of the expected Customer Journey is based around customer contact and the facilitation of the quote incorporating a smart enhanced surveyor visit. The process introduces smart advice to the customer – considering WAN/ HAN issues and the ability to enable a smart meter in the process. The Front-End Process of the expected Customer Journey, detailing how the responsibilities of different Parties interact within the process is shown in the diagram below:



Delivery Process

4.44 The Delivery Process of the customer journey can be found in the graphic below, which shows the delivery of the meter move, including the communications to the Supplier from the Distributor and the recognition for smart connectivity.

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4.45 Further details of the processes above are drawn out in the below commentary.

Charges

4.46 Associated charging of service alterations will only be determined by the Party which undertakes the meter move. Where the meter is moved by the Distributor, the associated cost will be included within the cost of the Service Alteration and agreed directly with the customer. Distributors will need to be clear on the cost element of the meter move and therefore the quote will clearly articulate the cost of the service alteration with and without the Distributor moving the meter. This will allow the customer the choice to contact their Supplier and compare pricing. If they have a legacy meter, they would have been informed that the Supplier may install a smart meter for free if this can be coordinated with the service alteration.

Customers with disability

4.47 The Working Group noted that in certain circumstances a customer with disability requesting a meter move to provide accessibility will receive this service for free from the Supplier. Distributors will ensure that their surveyors are aware of such circumstances.

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Liability

4.48 After legal review, it was acknowledged that the parties must act in accordance with good industry practice and that liabilities are already covered within DCUSA Clause 53. Therefore, an additional Clause was not needed unless there was good reason to extend the liability beyond what currently exists.

4.49 The Working Group could not highlight why moving of meters should be treated differently from any other Distributor or Supplier rights for which liabilities are agreed to be limited under clause 53.

4.50 Within the consultation responses, one Supplier was keen to extend the liability with respect to meter moves so that it did not come under the limitation of liability at Clause 53. They also stated the following:

4.51 "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".

4.52 The proposer makes the point that all parties to DCUSA have liabilities where they interact together and operate on each other's assets and the treatment of these liabilities in the DCUSA agreement is appropriately covered. The provisions governing liabilities in DCUSA have been in place since 2006 and would seem to be effective.

4.53 The proposer would further point out that all parties benefit from a consistent and measured approach with respect to liability. If it is thought that the liabilities are inadequate generally under DCUSA then it is believed that this concern is out of scope of this change and could be considered separately looking at a review of Clause 53.

4.54 After review, a majority of the Working Group considered that the existing liability Clauses within DCUSA are adequate to cover this proposal. However, the Supplier's response in 4.51 was acknowledged, and it should be noted that a Supplier does not have to allow Distributors to move meters during service alterations and therefore if uncomfortable with the existing liability arrangements could choose to opt-out of allowing such moves.

4.55 The full legal text can be found in Attachment 1.

Prepayment Meters

4.56 As stated above, the possibility of credit being lost on Prepayment Meters (PPM) through the meter move process was highlighted in discussions. Whilst meters are designed to be turned on and off without loss of functionality, the Working Group were advised that Meter Operators will record any credit on PPM before moving.

4.57 The Working Group agreed that if a Distributor moves a PPM, they should undertake the following:

- Make a note of the credit before meter move and check that it is the same after move.

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- Good practice would be to advice the customer to top-up prior to the meter move if credit is low.
- If credit is different, customer should be advised to contact the Supplier.
- Ensure that connectivity of PPM is maintained post move.
- If connectivity is lost, the Distributor/ customer should call the Supplier immediately so that a resolution between the customer and Supplier can be found. The risk of loss of connectivity is that the customer is unable to top-up and therefore once credit runs out supply will be lost.

4.58 The above guidance will be captured in the DCP 383 guidance document (Attachment 7).

Smart Meter Communications

4.59 As stated above, the Working Group acknowledged that at present there is no signal strength checks when the service alteration position is agreed, and Suppliers are left to connect and manage. Therefore, there is an opportunity to significantly improve the customer communication around smart meter connectivity earlier in the process. The next few sections detail what steps should be taken at the surveyor and jointers stage of the process.

Surveyor

4.60 The Working Group considered the surveyors activity and determined that if meter moves were to be agreed that the surveyor activity for service alterations would be critical to adding appropriate value – in some more remote areas the surveyor would also be the installer carrying out a pre visit.

4.61 The Working Group considered that the Distributors surveyors would add intelligence providing advice to the customer on the possible impacts of the move.

4.62 The advice provided should seek to avoid as part of the service alteration:

- Separation of the Gas and Electricity meter
- Adding extra walls in line of both WAN or HAN
- Moving to a basement position where the WAN could be impacted

4.63 These simple basic considerations are expected to have the most impact in terms of added value from pre site / quote surveys.

Jointer

4.64 Smart Meter communication functionality will need to be checked pre and post to the service alteration/ meter move to confirm that the customer's meter connectivity is unaffected in its new position.

4.65 On the smart meter communications hub there are five connectivity indicators (SW, WAN, MESH, HAN, GAS). The Distributor will need to check which of these connectivity functions are in use prior to the meter move and ensure that they are all working correctly post the meter move. Any differences identified will be articulated within the communications to the Supplier.

4.66 As stated above, it was noted within the consultation responses that there are signal checkers available on the market that can be used to check WAN/ HAN signals at the new position. It was agreed that this could be an option for Distributors but should not be made mandatory by this CP.

4.67 As good practice, it was also agreed that jointers should take a picture of the meter pre and post meter move.

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4.68 Legacy meters - where Legacy meters are moved, the same guidance applied in 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.

4.69 The above guidance will be captured in the DCP 383 guidance document (Attachment 7).

Training

4.70 There will be training provided to Surveyors, Jointers and operational auditors to aid in the movement of meters. The Working Group highlighted that along with practical and competency-based training it should also include the following as a minimum:

- Advice to the customer that they have a choice of whether the Distributor or Supplier moves their meter for in-scope arrangements. Also, consideration of Suppliers who do not want Distributors to move their meters,
- HAN/ WAN connectivity and the effects of moving a meter,
- Smart Meter connectivity indication, including connectivity with smart gas meter;
- In scope and out of scope meters;
- Advice to customers with legacy meters (i.e advice on getting a free smart meter installed from their Supplier; and
- Identifying customers with disability

4.71 Each Distributor will be responsible for developing and delivering the training.

Audits

4.72 The Working Group agreed that as part of the quality check and good practice jointers moving meters should take before and after pictures to show the quality of the installation and confirm the polarity connection and the test device outputs.

4.73 It is recommended that Distributors include auditing arrangements into their existing MOCOPA DNO audit process. It may be that the REC wish to consider any audit arrangements in the future, similar to that completed on MOPs. This is considered out of scope of this CP.

Support Smart Meter Programme

4.74 The customer will be advised that if they coordinate a smart meter installation with the Supplier, the meter move could be free of charge. It should also be noted that a legacy meter would only be moved by the Distributor when a customer does not express a desire for a smart meter, or a one-stop shop with a later separate date for a smart meter installation is agreed.

4.75 The above guidance will be captured in the DCP 383 guidance document (Attachment 7).

Information to the Supplier and MOP

4.76 There will be two stages at which the Distributor communicates to the Supplier and MOP. The surveyor stage and the jointers stage. The following information will be provided at each stage.

4.77 <u>Surveyor Stage</u>

- Confirmation that Distributor will move meter move during service alteration and date of intended work.

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4.78 Distributors will only move meters for Suppliers who have given their permission, but this pre-work alert will allow the Supplier another opportunity to reject the move if they wish.

4.79 Jointers Stage

- Confirmation of meter move and new location
- Meter serial number

4.80 If PPM has lost connectivity the Distributor will phone the Supplier immediately to ensure an appropriate resolution can be found between the customer and the Supplier.

Data Flow

4.81 It is proposed that new data flows are created which will allow for the pre and post work information to be automatically sent to both the Supplier and MOP. It is acknowledged that MRA has recently been incorporated into REC and that it may take around six-months for these new flows to be created. The Secretariat will work with REC to create these new flows. Attachment 8 contains the information that has been proposed to be included in the data flows.

Interim Solution

4.82 The Working Group discussed the possibility of an interim solution prior to specific data flows being created. Some Distributors are keen to start moving meters as soon as possible and as noted in the consultation responses some Suppliers were supportive of an appropriate interim solution.

4.83 It is proposed that as an interim solution, where Distributors move meters as part of a service alteration Suppliers should advise of appropriate contact details so that the above information can be provided prior and after any meter move.

4.84 It is acknowledged that some respondents were not supportive of an interim solution and therefore the Working Group proposes the following stages:

1. Decision from Authority regarding DCP 383
2. If approved, inform DCUSA Parties of decision
3. In accordance with maintaining the Supplier Hub Principles, inform Suppliers that they can opt-out of allowing Distributors to move their meters and they should inform the Secretariat of this within 10 Working Days of decision.
4. For those that are happy for Distributors to move their meters, they should inform the Secretariat whether they are happy with the proposed interim solution or whether they would prefer to wait until the data flows are created. This should be received within 10 Working Days of solution.
5. Secretariat will collate all the above information and provide the Distributors with the following information:
   - List of Suppliers that do not wish Distributors to move their meters
   - List of Suppliers that will allow Distributors to move meters and are happy to use interim solution
   - List of Suppliers that will allow Distributors to move meters, but not until an approved data flow is in place.

Seals

4.85 It was agreed that DNO staff carrying out the meter move activity would be equipped with the correct registered sealing pliers and seals so they can be individually identified. This will be included within the DCP 383 guidance document (Attachment 7) and is also articulated within the legal text.

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Summary

4.86 Concerns raised from Ofgem in relation to Supplier choice in similar rejected CPs in the past have been addressed. The Supplier will have the choice as to whether they approve a Distributor to move a meter or not by having the opportunity to opt-out if this CP is approved. They will also receive an alert pre meter move which allows another opportunity to reject a meter move.

4.87 The scope of which meters can be moved has clearly been defined in a document, which will be appropriately governed by the DCUSA Panel and published on the DCUSA website. This ensures an open and transparent process and ensures both Suppliers and Distributors are aware of the scope of this CP.

4.88 A Clause has been added to ensure that when Distributors move meters during service alterations, they do so in accordance with Good Industry Practice. Appropriate liability Clauses are already contained in Clause 53 of DCUSA where this is not the case.

4.89 Appropriate advice will be provided to the customer before, during and after the meter move. This includes advising customer they have a choice of Distributor or Supplier moving their meter, quote with and without meter move costs, advice on receiving a free smart meter if applicable, advice on potential connectivity risks and appropriate support for PPM customers.

4.90 The Working Group conclude that including a provision in the DCUSA to provide a facility for licensed Distributors to move whole current meters (agreed as in scope) as part of customer requested works to alter the service position, will improve customer service where the desire of the customer is for the Distributor to move the meter.

5 Code Specific Matters

Reference Documents

5.1 None

6 Relevant Objectives

Assessment Against the DCUSA Objectives

6.1 For a DCUSA Change Proposal to be approved it must be demonstrated that it better facilitates the DCUSA Objectives. There are five General Objectives and six Charging Objectives. The full list of objectives is documented in the DCUSA.

6.2 The Working Group considers that the following DCUSA Objectives are better facilitated by DCP 383.

DCUSA General Objectives	Identified impact
☐ 1 The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks	Positive

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☒ 2 The facilitation of effective competition in the generation and supply of electricity and (so far as is consistent therewith) the promotion of such competition in the sale, distribution and purchase of electricity	Positive
☐ 3 The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences	None
☒ 4 The promotion of efficiency in the implementation and administration of the DCUSA	Positive
☐ 5 Compliance with the Regulation on Cross-Border Exchange in Electricity and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.	None

6.1 The Working Group believes that DCP 383 will better facilitate DCUSA General Objective 1 because if the Distributor is allowed to move the meter it allows for the service alteration to be carried out by one Party, requiring less coordination for the customer and improve customer service.

6.2 The Working Group believes that DCP 383 will better facilitate DCUSA General Objective 2 as it offers choice to the customer and improves customer service.

6.3 The Working Group believes that DCP 383 will better facilitate DCUSA General Objective 4 as it seeks to deliver a solution enabling a more efficient interface between Distributors and Suppliers enabled through DCUSA.

7 Impacts & Other Considerations

Does this Change Proposal impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

7.1 N/A

Does this Change Proposal Impact Other Codes?

BSC	☐
CUSC	☐
Grid Code	☐
REC	☒
SEC	☐
Other	☐
None	☒

Consumer Impacts

7.2 Enabling this change will provide an opportunity for Distributors to offer a ‘one-stop-shop’ to customers for service diversions, significantly improving the customer journey through the service diversions process, potentially reducing overall costs and offering a choice of service. Customer will always have the choice to choose Supplier or Distributor.

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Consideration of Wider Industry Impacts

7.3 On 12 August 2016, Ofgem approved Change Proposal 253 to change the DCUSA to permit a Distributor, where working on service terminations to access the meter to tighten or re-terminate meter tails including provision to remove and replace the meter in as close to the same position as practical prior to re-energisation. The legal text was not at that time, constructed to address the moving of meters by a Distributor as part of service alterations and this is subsequently further addressed, with additional legal text, in this proposal.

Confidentiality

7.4 This Change is not confidential.

8 Implementation

Proposed Implementation Date

8.1 It is proposed that this CP should be implemented within the first DCUSA release after Authority approval.

8.2 As stated above, Suppliers will have the opportunity to opt-out, and express whether they wish to utilise the interim solution or wait until an approved data flow has been established.

9 Legal Text

9.1 The DCP 383 legal text acts as Attachment 1 to this Change Report.

10 Recommendations

Panel's Recommendation

10.1 The Panel approved this Change Report on 20 October 2021. The Panel considered that the Working Group had carried out the level of analysis required to enable Parties to understand the impact of the proposed amendment and to vote on DCP 383.

10.2 The Panel have recommended that this report is issued for Voting and DCUSA Parties should consider whether they wish to submit views regarding this Change Proposal.

11 Attachments

- Attachment 1: DCP 383 Legal Text
- Attachment 2: DCP 383 Voting Form
- Attachment 3: Customer feedback regarding service alterations
- Attachment 4: Request for Information and Industry Feedback
- Attachment 5: DCP 383 Consultation and Industry Responses

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- Attachment 6: Distributor Meter Moves During Service Alterations Scope Document
- Attachment 7: DCP 383 Guidance Document
- Attachment 8: Example data flow
- Attachment 9: DCP 383 Change Proposal

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