

DCP 383:

Provision for Distributors to Move Meters for Service Alterations

Date raised: 10 February 2021

Proposer Name: Paul Morris

Company Name: UK Power Networks

Company Category: DNO

01 – Change Proposal

02 – Consultation

03 – Change Report

04 – Change Declaration

Purpose of 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 a Consultation issued to DCUSA Parties and any other interested parties in accordance with Clause 11.14 of the DCUSA seeking industry views on DCP 383 'Provision for Distributors to Move Meters for Service Alterations

The Working Group recommends that this Change Proposal should proceed to Consultation.

Parties are invited to consider the questions set in section 10 and submit comments using the form attached as Attachment 1 to dcusa@electralink.co.uk by **21 July 2021**.

The Working Group will consider the consultation responses and determine the appropriate next steps for the progression of the Change Proposal (CP).



Impacted Parties: DNOs, IDNOs, Suppliers



Impacted Clauses: Introduction of new Clause

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Timetable

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

Change Proposal timetable

Activity	Date
Initial Assessment Report	17 February 2021
Consultation Issued to Industry Participants	30 June 2021
Change Report Approved by Panel	18 August 2021
Change Report issued for Voting	20 August 2021
Party Voting Closes	10 September 2021
Change Declaration Issued to the Authority	14 September 2021
Authority Decision	19 October 2021
Implementation	Next DCUSA release following Authority decision



Any questions?

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1 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 craftsman 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 Meter 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 4.10 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.
- 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.

2 Governance

Justification for Part 1 and 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.

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 2 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.

Question 1 Do you understand the intent of the CP?

Question 2 Are you supportive of the principles of the CP?

4 DCP 383 Working Group Assessment

- 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 3. 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 undertaken 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.

Working Group Assessment following RFI

- 4.8 Following the RFI the Working Group developed further the proposed solution. The following sections provide details of the proposal and seeks industry feedback.

Scope

- 4.9 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. Following the RFI, the Working Group discussed various types of complex metering and it was agreed that the Distributors could only move meters within the 'in scope' section in the table below:

In Scope – Normal Meters	Out of Scope - Complex
Domestic & Small Industrial Commercial	5 Terminal Meters Off Peak load
Whole Current Smart & Legacy 4 terminal Meters – Credit	Meters with Separate Timeswitches
Whole Current Smart & Legacy 4 terminal Meters – Key	Contactors for off-peak load
Resin Security Meter Tails in place	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)

Question 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.

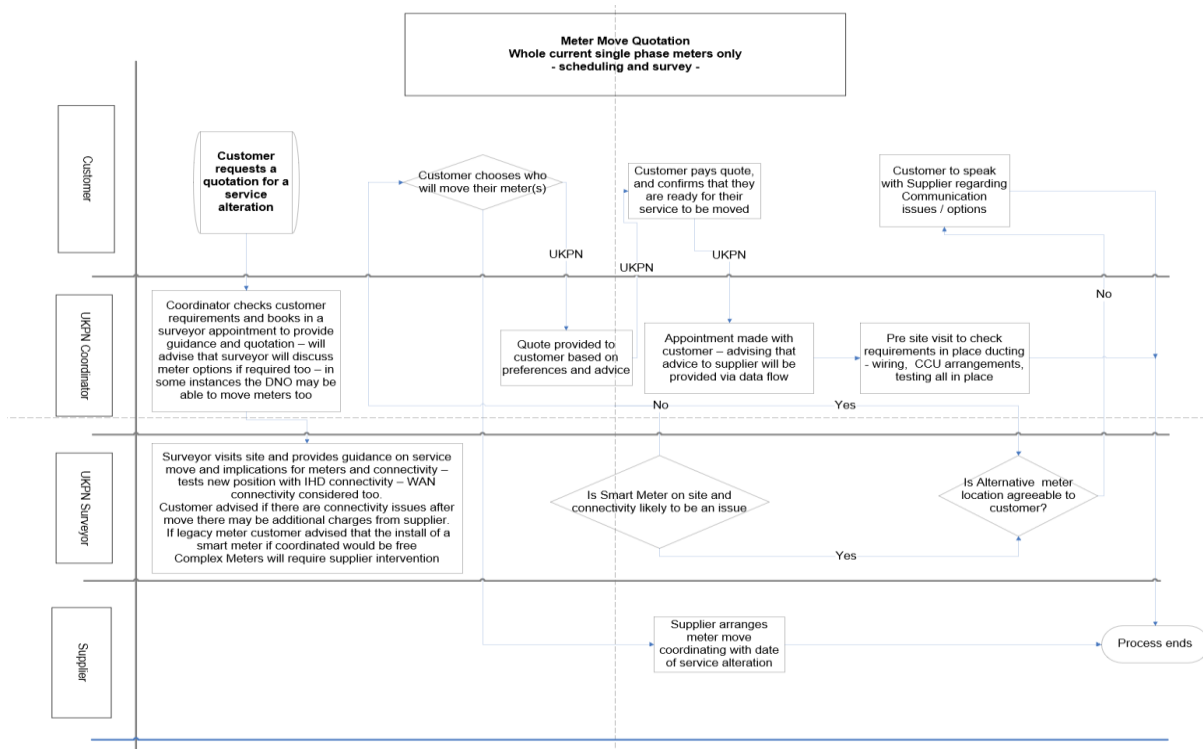
The governance arrangements needed to ensure there is a mechanism to allow for new metering arrangements and future amendments to the scope in relation to what meters can be moved by a Distributor.

- 4.10 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.
- 4.11 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.
- 4.12 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 occurred, such as a new meter type entering the market or an existing meter type moving in or out of scope.
- 4.13 The draft legal text for DCP 383 is provided as Attachment 4 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.

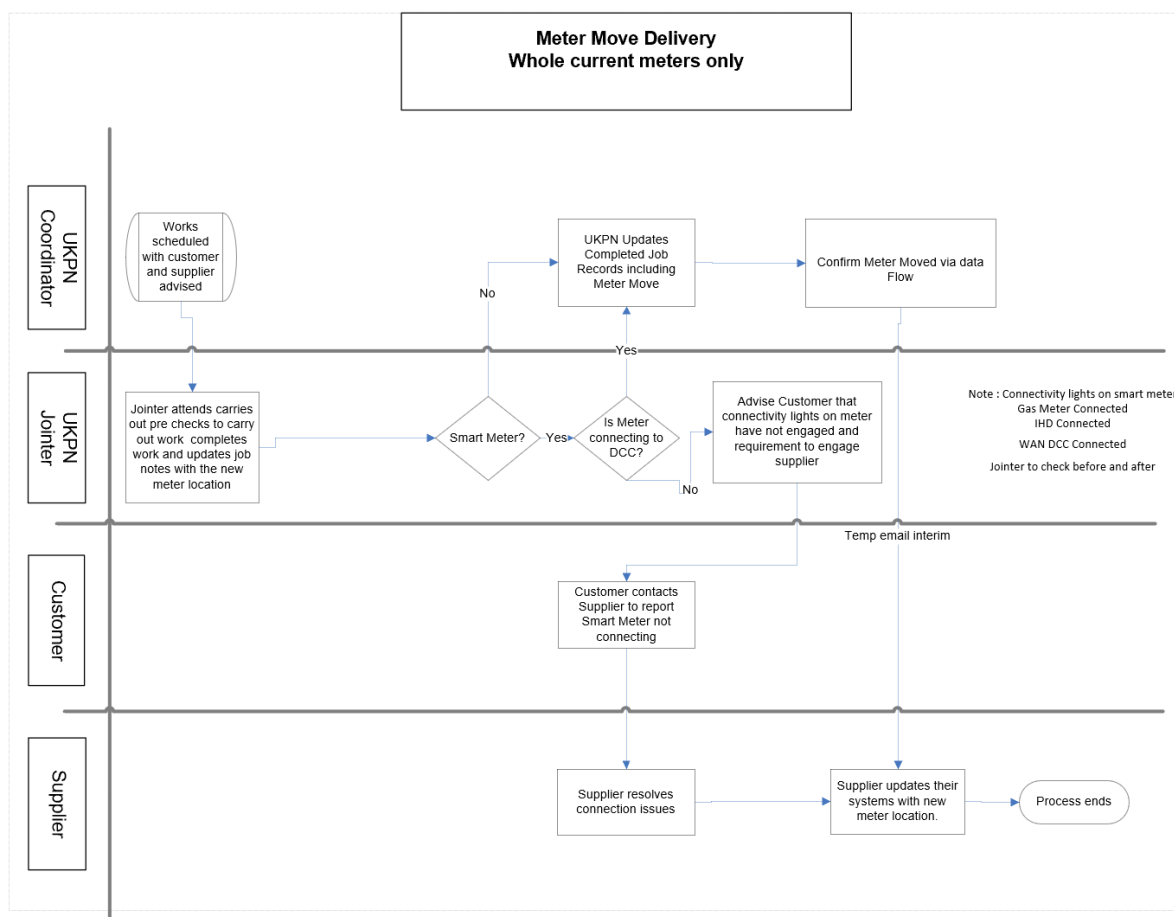
Expected Customer Journey

Front End Process

- 4.14 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:



4.15 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.



Question 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?

Charges

- 4.16 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.
- 4.17 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.

Liability

- 4.18 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”.

- 4.19 DCP 383 seeks to include a specific reference to liability were Distributors move meter as part of service alterations and believe that the new Clause suggested below, along the existing Clause above is sufficient to resolve any incidents where Supplier equipment is damaged.

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.

Question 5: Do you agree that the liability is adequately covered with the addition of the new Clause detailed in Section 4.18?

Prepayment Meters

- 4.20 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.

Question 6: Are there any other concerns in relation to moving a PPM?

Smart Meter Communications

Surveyor

- 4.21 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.
- 4.22 Currently, there are no signal strength checks when the service alteration position is agreed, and Suppliers are left to connect and manage. Therefore, it is proposed as a minimum to use the IHD connectivity as an indicator from the new position to the existing service position as part of the initial survey if smart is in place to minimise possible communication issues.

Jointer

- 4.23 Smart Meter communication functionality will need to be tested pre and prior to the service alteration and meter move to confirm that the Customer's meter connectivity is unaffected in its new position.
- 4.24 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.

Question 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?

Question 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?

Training

- 4.25 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; and
 - Advice to customers with legacy meters (i.e advice on getting a free smart meter installed from their Supplier.
 - Identifying customers with disability

Question 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?

Audits

- 4.26 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.

Question 10: Is this adjustment to current auditing arrangements considered adequate to manage any risks?

Support Smart Meter Programme

- 4.27 The Working Group noted that 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. The customer will be advised that if they coordinate a smart meter installation with the Supplier, the meter move would 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.

Question 11: Does the approach described in Section 4.27 adequately support the Supplier smart meter programme?

Information to the Supplier

- 4.28 The Working Group agreed 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, the latest recorded meter reading, the location of the meter and confirmation that the meter has maintained connectivity.
- 4.29 Consideration is needed as to whether this information needs to be sent via a new data flows or whether the use of an existing data flows would be appropriate. It has been noted that with MRA moving into the 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.
- 4.30 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. Consideration of the use of an appropriate data flow can be considered post implementation, if this CP is approved.

Question 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?

Question 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?

Seals

4.31 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.

Old DCPs:

DCP 019 and DCP 037

4.32 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'

4.33 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.

Question 14: Do you believe that this mitigation adequately covers the issues previously highlighted by Ofgem?

5 Assessment Against the DCUSA Objectives

5.1 For a DCUSA CP to be approved it must be demonstrated that it better facilitates the DCUSA Objectives. There are five General Objectives and six Charging Objectives. DCP 383 will be measured against the DCUSA General Objectives, which are set out in the table below:

DCUSA General Objectives	Identified impact
<input type="checkbox"/> 1 The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks	None

<input checked="" type="checkbox"/> 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
<input type="checkbox"/> 3 The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences	None
<input checked="" type="checkbox"/> 4 The promotion of efficiency in the implementation and administration of the DCUSA	Positive
<input type="checkbox"/> 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

5.2 The Proposer believes that DCP 383 will better facilitate DCUSA General Objective 2 as it seeks to deliver a solution that rectifies an arrangement that undermines effective competition between Suppliers and Distributors.

5.3 The Proposer believes that DCP 383 will better facilitate DCUSA General Objective 4 as it seeks to deliver a solution that addresses inefficiencies in current processes that lead to avoidable errors and unnecessary risk.

Question 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.

If not, please provide supporting reasons

6 Impacts & Other Considerations

7.1 *The change should be supported by an appropriate facility for DNOs to advise Suppliers of the meter being moved.*

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

7.2 N/A

Does this Change Proposal Impact Other Codes?

BSC ☐

CUSC ☐

Grid Code ☐

- | | |
|-------|-------------------------------------|
| MRA | <input checked="" type="checkbox"/> |
| SEC | <input type="checkbox"/> |
| Other | <input type="checkbox"/> |
| None | <input type="checkbox"/> |

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.

QUESTION 16: Are you aware of any wider industry developments that may impact upon or be impacted by this CP?

Confidentiality

- 7.4 This Change is not confidential.

7 Implementation

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

Question 17: Are you supportive of the proposed implementation date being the first DCUSA release following Authority approval?

8 Legal Text

- 8.1 The proposed legal text can be found in attachment 4.

Question 18: Do you have any comments on the proposed legal text?

9 Code Specific Matters

Reference Documents

- 9.1 Not applicable.

10 Consultation Questions

10.1 The Working Group is seeking industry views on the following consultation questions:

No.	Questions
1	Do you understand the intent of the CP?
2	Are you supportive of the principles of the CP?
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.
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?
5	Do you agree that the liability is adequately covered with the addition of the new Clause detailed in Section 4.18?
6	Are there any other concerns in relation to moving a PPM?
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?
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?
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?
10	Is this adjustment to current auditing arrangements considered adequate to manage any risks?
11	Does the approach described in Section 4.28 adequately support the Supplier smart meter programme?
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?
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?

14	Do you believe that this mitigation adequately covers the issues previously highlighted by Ofgem?
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.
16	Are you aware of any wider industry developments that may impact upon or be impacted by this CP?
17	Are you supportive of the proposed implementation date being the first DCUSA release following Authority approval?
18	Do you have any comments on the proposed legal text?
19	Any other comments?

10.2 Responses should be submitted using Attachment 1 to dcusa@electralink.co.uk no later than, **21 July 2021**.

10.3 Responses, or any part thereof, can be provided in confidence. Parties are asked to clearly indicate any parts of a response that are to be treated confidentially.

11 Attachments

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