

DCP 394 Working Group Meeting 03

06 January 2022 at 14:00 - Web-Conference

Attendee	Company
Working Group Members	
Boz Laird-Clowes [BLC]	BEIS
Colette Baldwin [CB]	Gemserv
David Jones [DJ]	Alt Han Co.
Finn Davies-Clark [FDC]	SSE
Frank Bertie [FB]	NAPIT
Geoff Huckerby [GH]	Power Data Associates
George Barnes [GB]	Utilita
Jonathan Elliott [JE]	Certsure
Kevin Liddle [KL]	NPg
Kevin Woollard [KW]	Centrica
Lee Stone [LS]	EON
Martyn Allen [MA]	Electrical Safety First
Paul Abreu [PA]	Energy Networks Association (ENA)
Paul Morris [PM]	UK Power Networks
Richard Brady [RB]	Western Power
Richard Hill [RH]	British Gas
Scott McLaughlin [SM]	SP Energy Networks
Tom Callow [TC]	BP Pulse
William McKay [WM]	SSEN
Code Administrator	
Hannah Proffitt [HP] (Technical Secretariat)	ElectraLink

Richard Colwill [RC] (Chair)	ElectraLink
Apologies	
Paul Hollowood [PH]	NPg
Warren Lacey [WL]	NPg

1. Administration

- 1.1 The Working Group (WG) reviewed the “Competition Law Guidance”. All Working Group members agreed to be bound by the Competition Law Guidance for the duration of the meeting.
- 1.2 Updates on all actions are provided in **Appendix A**.
- 1.3 The group reviewed the minutes from the previous meeting held on 22 November 2021. Members approved the minutes as a fair and accurate representation of events.

2. Purpose of the Meeting

- 2.1 The Chair advised that they had circulated a draft consultation document to members to be discussed at the meeting. The Chair noted that the aim will be to issue an industry consultation in the next couple of weeks with fully developed draft DCUSA legal text, along with the proposed Retail Energy Code (REC)/ Meter Operation Code of Practice (MOCOP) legal text.
- 2.2 The Chair noted that the purpose of the meeting was to agree what needs to be captured in the consultation, so that appropriate actions can be taken away for completion. The Chair outlined the below key considerations.
 - Agree scope of works Meter Operator will undertake as described in consultation
 - Agree what needs to be in the DCUSA legal text (i.e scope of works, liability, provision of information) – some good examples of similar arrangements can be found in Section 2C – 2F within DCUSA. We can look at these and aim to develop in the next week.
 - Agree what needs to be in the REC/ MOCOPA legal text.
 - Do WG agree with the commentary regarding Smart Energy Code (SEC) and Data Communications Company (DCC) in consultation document?
 - Is existing relationships with Meter Asset Providers sufficient?
 - Consumer – is it the case that the MOA would be acting on behalf of the customer or on behalf of someone else who has agreement with the customer? i.e this would sit separately outside of this DCUSA Change Proposal (DCP)?
- 2.3 The Chair highlighted that at the previous meeting, an action was taken to draft a Request for Information (RFI) to be circulated to Suppliers and Meter Operators (MOPs) seeking views on the liabilities of MOPs working independently. The Chair noted that they had decided not to go ahead with

this as on reflection it seemed more appropriate to issue a more comprehensive consultation providing more context to the overall solution.

3. Discuss Cross-Code Impacts

- 3.1 CB provided an update to the WG regarding the initial REC considerations for the DCP.
- 3.2 CB advised that the Code Manager needs to review the Metering Equipment Manager (MEM) Accreditation process in light of this new type of MEM and may need to consider a different definition of the term.
- 3.3 CB added that the solution should consider whether there is a need to clarify the scope of eligible activities the non-supplier appointed MEM's will be permitted to undertake and whether this should be defined and set out in the REC.
- 3.4 CB also noted the need to consider whether their status as a non-supplier appointed MEM introduces additional risks that will need to be considered by the REC Performance Assurance Board (REC PAB). CB advised that they will need to ascertain whether there is a need for any additional assurance, compliance or audit requirements to be introduced to mitigate any risk.
- 3.5 CB highlighted that, for situations where work is instigated by the landlord, the solution needs to consider access to any Priority Service special needs information as the Landlord may be unaware of those needs. The solution needs to consider how MEMs can have access to the relevant information in advance of carrying out the work.
- 3.6 CB noted the General Data Protection Regulations (GDPR) impacts and raised that consent will need to be considered as part of the solution.
- 3.7 CB highlighted that the development of the solution will need to understand the non-supplier appointed MEM's responsibility to report any evidence of meter tampering and/or to notify the Registered Supplier/Distribution Network Operator (DNO) of any unsafe situations that go beyond the remit of the work they are contracted to undertake. This will include the MEM communicating with the Registered Supplier and/or DNO and may also require the MEM to communicate information about leaving a site with a change in Energisation Status where the site has been left de-energised for safety reasons.
- 3.8 CB noted that where a smart meter has been de-energised and re-energised, but the smart meter communications fail to re-establish, the MEM carrying out work will be required to inform the Consumer and advise them to contact their Registered Supplier so that the supplier may investigate, and if necessary, send their own appointed MEM to fix the fault.
- 3.9 CB outlined that the development of the solution will determine how these communications will be achieved and whether it is possible to use existing methods to send information to the Registered Supplier/DNOs and who the appropriate points of contact are.

4. Review Consultation Document and Associated Attachments

- 4.1 The Working Group reviewed the skeleton consultation.

- 4.2 Regarding section 4.5, the Chair asked the group whether they agree with the outlined scope of work that a Meter Operator should be able to undertake when acting as a single entity. KW, the Proposer of the DCP noted that they wanted to keep the scope as tight as possible. The group agreed with this approach.
- 4.3 CB suggested that it may be appropriate to use a different term other than MEM and to develop an alternative description to reflect the reduced scope of the role. CB raised the issue that the current REC definition of MEM accounts for them being Supplier appointed only, and therefore this will need to be amended.
- 4.4 It was clarified that the work would still need to be carried out by a REC accredited MEM but it will extend their scope to perform de-energisation and re-energisation works without working under the instruction of the Supplier (i.e you would need to be an accredited MEM as currently defined before being able to provide the services proposed under DCP 394).
- 4.5 Another member raised that from a DNO point of view, they are working through extensive smart meter roll out programmes and that once this change is implemented and work is opened up, they could have more Category A and B type issues coming in. The member queried how this will be funded and noted that if contractors are allowed to utilise the system, it could overwhelm the system which is already near capacity. The member summarized that they appreciate the benefits of the change but are aware of the challenges.
- 4.6 Regarding section 4.5 of the consultation, the WG agreed that the bullet point concerning installation of an isolator should be removed as it is out of the scope of DCUSA. KW noted that this was included as DCUSA contains this language already, however agreed that they are happy for this point to be removed.
- 4.7 LS asked whether Elexon have engaged with this change as effects on Settlement need to be considered. CB confirmed that Elexon's initial response was that they do not believe there are any cross-code impacts.
- 4.8 LS agreed to articulate the specific concerns to CB who would then refer back to Elexon.

ACTION 03/01: LS to work with CB to capture concerns over potential impacts of DCP 394 on Settlement and communicate these to Elexon.

- 4.9 SM raised the issue of disconnection alerts received by the DNO. It was noted that DNOs would not react for one alert, however if a large number of alerts were received due to work being completed on a block of flats they may attend. It was suggested that it would be useful for DNOs to be warned ahead of receiving a large number of disconnection alerts, so they know there is not an issue.
- 4.10 PM suggested a different approach to the solution, where the Supplier can operate on other Suppliers' meter points which would enable one point of contact for the customer. It was noted that this was discussed previously, however there was no appetite from Suppliers.
- 4.11 The Chair highlighted that a section regarding the provision of information is to be included in the legal text as there will need to be the ability for MEMs to communicate to the Supplier and Distributor. The Chair noted that considering the Parties will already be accredited MEMs, they will have access to the flows, however this may only be for their appointed Supplier.

- 4.12 CB noted that if the MEM is not the Suppliers appointed MEM, they may not know who the Supplier is to send the flows to.
- 4.13 It was suggested that the necessary communications should be mapped out to give a clear view of what is required and a clearer idea of the potential costs. The Chair suggested that a subgroup is formed to discuss the provision of information and the potential system changes that would be needed.
- 4.14 CB agreed to organise a subgroup meeting. LS, RH, RB and GB volunteered to take part. CB agreed to issue a doodle poll to assess availability.

ACTION 03/02: CB to organise subgroup meeting with LS, RH, RB and GB to discuss the provision of information. Feedback on outputs to be discussed at the next WG meeting.

- 4.15 Regarding the Settlement concerns, GB advised that they had spoken to their Settlement team concerning DCP 383¹ and had been advised that a notification to state that works have taken place was all they needed. GB noted that the interim solution is a template email and the enduring solution will be the creation of a new data flow. GB suggested that the solution could link to the solution for DCP 394.

5. Next Steps

- 5.1 The Chair asked the group whether, following the discussions held in the meeting, they are happy for the DCUSA legal text to be drafted and proposed.
- 5.2 LS asked if the legal text goes for consultation now and amendments are needed, whether it would need to go for a further consultation. The Chair noted that it would only need further consultation if the scope of the solution changes.
- 5.3 CB advised that REC is unable to release a formal consultation on the legal text at this stage due to the REC change process needing to be followed. CB noted that legal text is not able to be provided until the preliminary change report stage. CB asked if the DCUSA change could be paused at this stage to align with the REC change process. CB highlighted that Ofgem have the expectation that the consultations will be aligned.
- 5.4 KW asked how long the DCP would need to be paused for. CB noted that it could potentially be 40 days and is likely to be consulted on in April. RC highlighted that the original implementation date for the change was June 2022. CB noted that this was based on a lighter interpretation of the change.
- 5.5 The group discussed and agreed for the next WG meeting to be scheduled for Thursday, 03 February between 10:00-13:00 at which they can discuss the outputs of the provision of information subgroup.

6. Any Other Business

- 6.1 The Chair asked the Working Group if there was any other business to which nothing was raised.

¹ DCP 383 - Provision for Distributors to Move Meters for Service Alterations

6.2 The Chair thanked members and closed the meeting.

7. Date of Next Meeting

7.1 The date of the next meeting has been scheduled for Thursday 03 February 2022 at 10am.

APPENDIX A

New and Open Actions

Action Ref.	Action	Owner	Update
01/01	Secretariat to draft an RFI to be circulated to Suppliers and MOPs seeking views on the liabilities of MOPs working independently.	ElectraLink	Closed.
01/02	Secretariat to contact an Ofgem seeking representation for this CP and to seek guidance of any potential challenges around this change.	ElectraLink	Closed – Michael Walls to attend.
01/03	Secretariat to look at the Gas Supplier accession process to consider whether this would be suitable for the accession of MOPs.	ElectraLink	Closed.
01/04	RC and CB to discuss offline aligning the timetables of this change with REC.	RC/CB	Ongoing.
02/01	Secretariat to circulate update RFI document, once available.	ElectraLink	Closed.
03/01	LS to work with CB to capture concerns over potential impacts of DCP 394 on Settlement and communicate these to Elexon.	LS/CB	New action.
03/02	CB to organise subgroup meeting with LS, RH, RB and GB to discuss the provision of information. Feedback on outputs to be discussed at the next WG meeting.	CB	New action.