Part A: Generic

DCUSA Change Proposal (DCP)	At what stage is this document in the process?
DCP 400: **Commissioning of Works using shared Meter Operator services by the Crowded Meter Room Coordinator** **Date Raised:** 21 January 2022 **Proposer Name:** Carl Dennis **Company Name:** Shell Energy **Party Category:** Supplier	**01 – Change Proposal** 02 – Consultation 03 – Change Report 04 – Change Declaration

Purpose of Change Proposal:

To allow Alt HAN Co, acting as a Crowded Meter Room Co-ordinator to commission necessary works, using a shared Meter Operator, to resolve meter room issues that enable the installation of Smart and Alt HAN equipment.

Governance:

The Proposer recommends that this Change Proposal should be:

- Treated as a Part 1 Matter
- Treated as a Standard Change
- Progressed to the Working Group phase

The Panel will consider the proposer's recommendation and determine the appropriate route.

Impacted Parties:

Suppliers, DNOs and IDNOs

Impacted Clauses:

It is believed that this CP is likely to require updates to a number of Sections and Clauses including additional definitions in Section 1A, amendments to Clause 25 (De-energisation/Re-energisation), as well as potential for amendments through Sections 2C to 2F and Section 3, Clause 53 (Liabilities).

Contents

Indicative Timeline

The Secretariat recommends the following timetable:

Initial Assessment Report	16 February 2022
Consultation Issued to Industry Participants	TBC
Change Report Approved by Panel	13 July 2022
Change Report issued for Voting	22 July 2022
Party Voting Closes	12 August 2022
Change Declaration Issued to Parties	16 August 2022
Change Declaration Issued to Authority	16 August 2022
Authority Decision	20 September 2022

Any questions?

Contact:

Code Administrator

DCUSA@electralink.co.uk

020 7432 3011

Proposer:

Carl Dennis

Carl Dennis

carl.dennis@shellenergy.co.uk

07842885506

Other:

David Jones

David.jones@althanco.com

07850264678

Other:

Irmeen Khan

Irmeen.khan@althanco.com

telephone

1 Summary

What?

1.1 To amend the DCUSA to allow Alt HAN Co, acting as a Crowded Meter Room Co-ordinator to commission necessary works, using a shared Meter Operator, to resolve meter room issues that enable the installation of Smart and Alt HAN equipment.

1.2 In addition, we believe that the following additional changes may be necessary:

(i) That Alt HAN Co becomes a signatory to the DCUSA (unless the changes in 1.1 can be given effect without the need for the accession); and

(ii) Data sharing provisions are established between Alt HAN Co as the Crowded Meter Room Co-ordinator, Suppliers and Network Operators for the purposes of identifying building network owners, landlords/owners.

Why?

1.3 This change would allow Alt HAN Co to establish a mechanism by which it could investigate and resolve issues related to Crowded Meter Rooms, on behalf of all affected stakeholders, which would in turn enable the installation of Smart and Alt HAN equipment allowing smart benefits to flow to those consumers.

1.4 By implementing a collective solution to enable meter rooms to be Smart and Alt HAN ready, this would allow for the co-ordination of actions across multiple Resolving Parties (e.g. building owner, Suppliers and network operators) and jurisdictions minimising the number of aborted installations, and associated smart abort costs, for Energy Suppliers and allowing for a more cost effective use of industry resources and less disruptive experience for consumers.

1.5 The option of data sharing in 1.2(ii) would support both the Crowded Meter Room Co-ordinator and Network Operators in being able to access the data needed to resolve issues with building access and contacts for permission for works.

How?

1.6 This change would amend the DCUSA to allow Alt HAN Co Ltd, acting as the Industry Coordinator[1] on behalf of Energy Suppliers to orchestrate resolutions in a Crowded Meter Room by coordinating with capable resolving parties (MOPs, DNOs, IDNOs and BNOs) and commissioning the necessary works. In doing so, the Crowded Meter Room Co-ordinator would accept liability for such works on behalf of Energy Suppliers (for which the Crowded Meter Room Co-ordinator may need to become a DCUSA Party).

[1] The CMRC would work under direction from the Alt HAN Forum and would only commission works, where such activity has met an Economic Test as agreed by Relevant Energy Suppliers.

2 Governance

Justification for Part 1 and Part 2 Matter

Requested Next Steps

2.1 This Change Proposal should be treated as a Part 1 Matter as it is likely to have an impact on commercial activities connected to the distribution and supply of electricity (i.e., which premises can receive smart metering) as per DCUSA Clause 9.4.2(D).

2.2 This Change Proposal should:

- Be treated as a Part 1 Matter;
- Be treated as a Standard Change; and
- Proceed to the Working Group phase.

3 Why Change?

3.1 A Crowded Meter Room, is a scenario whereby a Meter Room or Meter Cupboard, containing a collocation of Meter Points in space constrained by inhibiting factors, resulting in challenges to installing or replacing Metering infrastructure, specifically Alt HAN Equipment. In addition, SMETS2 installations could be prohibited without corrective works.

3.2 Without the ability to install the Alt HAN Wired Bridge Device (and it some cases, even the SMETS2 Smart Meter itself) where the Meter Point is an Alt HAN Candidate, the SMET2 Comms Hub is ultimately unable to establish a HAN with the associated premises in the MDU, or any associated remote Gas Meter Points (GSME / MPRNs).

3.3 Without a process/mechanism for resolving CMRs, it will be the case that Suppliers are unable to fully deploy solutions to establish a HAN for all Alt HAN Candidates (and potentially any corresponding SMETS2 candidates).

3.4 By allowing this change to be made to the DCUSA, Alt HAN Co, acting as a Crowded Meter Room Co-ordinator would be enabled to coordinate necessary metering works in order to find resolutions for CMRs.

3.5 A change to DCUSA is required to allow Alt HAN, acting as a Crowded Meter Room Coordinator (CMRC), to be permitted by DCUSA parties to commission works to resolve CMRs. Permission is likely to be required, depending on the resolution, from:

a. distributors, because the CMRC would potentially need to do work on distribution network assets;
b. electricity suppliers, because the CMRC would potentially need to move meters;
c. the meter asset providers, who make these meters available to the electricity suppliers; and
d. the building owner (building network operator – BNO).

3.6 Consent could be obtained from all licensed electricity distributors and from all licensed electricity suppliers by amending the DCUSA.

3.7 In addition, consideration should be given to the opportunity for data sharing between the Crowded Meter Room Co-ordinator and Network Operators over building network owners and or/landlords.

Part B: Code Specific Details

4 Solution and Legal Text

Legal Text

4.1 The legal text is to be developed by the Working Group.

Text Commentary

4.2 It is intended to amend the DCUSA to add provisions which would allow Alt HAN Co, acting as the CMRC to obtain consent from all licensed electricity distributors and from all licensed electricity suppliers to allow it to commission works to resolve CMR issues.

4.3 Adding rights for AHC (as CMRC) in the DCUSA would be similar to the process that was undertaken for 'gas-first' smart meter installations, for which gas suppliers were given rights under the DCUSA to work with the distribution network and the electricity meter for the purposes of gas smart meter installations (see Sections 2C and 2D of the DCUSA).

4.4 Similar provisions could be added to the DCUSA to obtain consent from licensed distributors and licensed electricity suppliers for works on / movement of wires/meters to the extent reasonably necessary for installation of Alt HAN Equipment. Alt HAN Co would need to use a qualified meter operator, and AHC would need to accept liability for damage to physical property and personal injury (but not loss of profit/business). Alt HAN Co would be able to pass this risk on to its meter operator, who could insure the risk. Alt HAN Co could become a DCUSA Party.

4.5 The DCUSA could also contain an undertaking from electricity suppliers to ensure that the meter asset provider consents to AHC's rights.

4.6 The DCUSA could additionally establish data sharing obligations and rights between the Crowded Meter Room Co-ordinator and Network Operators over building network owners and or/landlords.

5 Code Specific Matters

Reference Documents

5.1 None.

6 Relevant Objectives

	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
☑	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	Positive
☑	4. The promotion of efficiency in the implementation and administration of the DCUSA	Neutral
☐	5. Compliance with the EU Internal Market Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.	None

	DCUSA Charging Objectives	Identified impact
☐	1. That compliance by each DNO Party with the Charging Methodologies facilitates the discharge by the DNO Party of the obligations imposed on it under the Act and by its Distribution Licence	None
☐	2. That compliance by each DNO Party with the Charging Methodologies facilitates competition in the generation and supply of electricity and will not restrict, distort, or prevent competition in the transmission or distribution of electricity or in participation in the operation of an Interconnector (as defined in the Distribution Licences)	None
☐	3. That compliance by each DNO Party with the Charging Methodologies results in charges which, so far as is reasonably practicable after taking account of implementation costs, reflect the costs incurred, or reasonably expected to be incurred, by the DNO Party in its Distribution Business	None
☐	4. That, so far as is consistent with Clauses 3.2.1 to 3.2.3, the Charging Methodologies, so far as is reasonably practicable, properly take account of developments in each DNO Party's Distribution Business	None
☐	5. That compliance by each DNO Party with the Charging Methodologies facilitates compliance with the EU Internal Market Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators; and	None
☐	6. That compliance with the Charging Methodologies promotes efficiency in its own implementation and administration.	None

6.1 We believe that DCUSA General Objective 1 and 2 will be better facilitated by the implementation of this change as there will be increased efficiencies gained by using a co-ordinated approach to overcome the current situation whereby smart meter installs to premises that have crowded/ shared meter rooms aren't able to proceed without the intervention of multiple parties.

6.2 This change will enable Alt HAN, acting as a Crowded Meter Room Coordinator (CMRC), to be permitted by DCUSA parties to commission works to resolve CMRs. This will alleviate some of the issues that are currently faced by industry as well as customers who have been unable to secure their smart meter installs due to the current lack of a co-ordinated approach. These delays result in jobs being aborted, and in some cases, customers cancelling jobs which inhibits progress towards net zero and the ability of Suppliers to offer new innovative tariffs.

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 We have not identified any impact on any current SCR.

Does this Change Proposal Impact Other Codes?

BSC……....	☐	MRA……	☐
CUSC……	☐	SEC……	☐
Grid Code…….	☐	REC…….	☐
Distrbution Code..	☐	None…….	☒

7.2 We have carried out some initial work with the REC Code Manager and have not currently identified any cross code impacts, although, during the development of the Change Proposal, the Working Group should keep this under consideration.

Consideration of Wider Industry Impacts

7.3 The issue of Crowded Meter Rooms, or more specifically, the concerns about the lack of a collaborative approach to the considered evolution of Meter Room engineering, has existed for many years, if not decades. Possible solutions have been discussed at industry forums including BEIS' Smart Metering Operations Group (SMOG) and trade associations.

7.4 This change proposal is built on considerable analysis undertaken by Alt HAN Co. Ltd. to identify potential solutions to the challenge of Crowded Meter Rooms. Establishing an Industry Coordinator to undertake the aforementioned works was identified through industry consultations as the most efficient and effective solution of a series of viable resolving options.

7.5 In some instances, by resolving Crowded Meter Rooms to facilitate the installation of Alt HAN devices, the installation of SMETS2 meters more generally would also be facilitated. This is because the works would apply to Crowded Meter Rooms in buildings where some, but not all, impacted premises may require Alt HAN solutions while others would not.

7.6 Data sharing between the Crowded Meter Room Co-ordinator and Network Operators over building network owners and/or landlords information should assist in the speedy resolution of issues with access to buildings and future works.

Confidentiality

7.7 Not applicable.

8 Implementation

Proposed Implementation Date

8.1 We believe that this Change Proposal should be implemented as soon as possible (e.g. two business days), following Authority approval.

9 Recommendations

The Code Administrator will provide a summary of any recommendations/determinations provided by the Panel in considering the initial Change Proposal. This will form part of a Final Change Report.