

DCP 400 ‘Commissioning of Works using shared Meter Operator services by the Crowded Meter Room Coordinator’ Electrical Installations COLLATED CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS

Company	Confidential/ Anonymous	1. Do you understand the intent of the DCP 400?	Working Group Comments
Alt HAN Co	Non-confidential	Yes, Alt HAN Co developed the proposals which led to DCP400 through prior project work on Crowded Meter Room issues.	Noted.
Electricity North West	Non-confidential	<p>We understand the intent and note the interaction with DCP 394 which, if approved, permits, for example, any REC accredited MEM to carry out de-energisation and re-energisation works, minimal repositioning of metering equipment and installing, operating, inspecting, maintaining, repairing, renewing, repositioning, replacing and/or removing Smart Metering Comms Hub Devices.</p> <p>Is it worth considering combining DCPs 394 and 400?</p> <p>We also question DCUSA’s position to give Alt HAN Co. permission to commission works as this must come from the building owner. Permission for the works the CMRC wishes to commission from various parties already exists.</p>	<p>Noted.</p> <p>Whilst the WGs understand the rationale behind this (i.e. MEMs being able to work on metering points under the instruction of someone other than their appointed Supplier) they agreed the DCPs should be separate, as they can both be progressed separately.</p> <p>The WG note that this matter is covered under the Alt HAN process map.</p>

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Southern Electric Power Distribution plc (SEPD) & Scottish Hydro Electric Power Distribution plc (SHEPD)	Non-confidential	Yes, I understand the intent of DCP 400, I have attended the working groups and a bilateral with Alt HAN Co to discuss DNO impacts.	Noted.
Western Power Distribution	Non-confidential	Yes	Noted.
SSE Energy Supply Ltd	Non-confidential	Yes	Noted.
British Gas	Non-confidential	<p>Yes.</p> <p>We recognise that DCP 400 is required in order to allow facilitate the resolution of crowded meter rooms, under the TOM currently being developed by Alt HAN Co.</p> <p>We understand that DCP 400 is expected to build upon the DCP 394 change currently ahead of it in the change process.</p>	<p>Noted.</p> <p>Agreement is that the two DCPs sit separately.</p>

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		There seems to be an error on the “DCP 394 vs 400” table on page 8 of the DCP 400 Background slides that were shared with the DCP consultation. In particular, the ‘Extent of works (1)’ items (a) – (f) are not linked to DCP 394, but are already permitted for a MOP acting on behalf of another Energy Supplier, through DCP 304.	The slides have been updated.
Northern Powergrid	Non-confidential	Yes	Noted.
<p>Working Group Conclusions:</p> <p>All responders indicated that they understand the intent of the DCP.</p> <p>One response suggested that DCP 394 and DCP 400 are combined, the Working Group noted that they have agreed the two should sit separately. Whilst they are similar in nature, they aim to achieve two different outcomes.</p>			

Company	Confidential/ Anonymous	2. Are you supportive of the principles of DCP 400?	Working Group Comments
Alt HAN Co	Non-confidential	Yes, DCP400 is an enabling change that allows for the piloting of a solution to address Crowded Meter Room issues that may prevent the installation of Alt HAN equipment and Energy Supplier’s meeting their obligations with regards to the smart rollout.	Noted.
Electricity North West	Non-confidential	We are broadly supportive of the principles from a customer’s perspective and the need to aid the rollout of smart meters.	Noted.

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		<p>Recognising that DNOs are not responsible for metering equipment so care should be taken not to blur the clear lines of responsibility which exist currently.</p> <p>Also, [3.5] in the consultation states that the CMRC will potentially need to work on a DNO’s assets, but the CMRC appointed MOP/MEM will be able to operate the cut-out fuse to a property to deenergise/energise to ensure safe isolation to facilitate work.</p> <p>Any further work would need DNO Authorisation. Therefore, the CP needs to be clearer if this means a fuse to a single exit point (up to 100A or a larger incoming installation providing supplies to several customers. Also, [3.7] may need to clarify how we refer to BNO where a DNO accepts they are the BNO. A DNO may accept that they need to work on a BNO whilst at the same time they may not agree to accept it onto their network so the two roles may contradict one another.</p> <p>Within [3.8], we think that sharing BNO information may need to be excluded as it is adding further complication. All CMRC work is in communal metering positions and so minimal BNO work should be required as far as DNOs are concerned.</p>	<p>The WG note that this matter is covered under the Alt HAN process map.</p> <p>This information will not form an enduring list. It will be used for the purpose required only.</p>
Southern Electric Power Distribution plc (SEPD) & Scottish	Non-confidential	I support the principles of DCP 400 to ensure consumers can access the benefits from smart meters and that crowded meter room constraints preventing installations are identified and remediated in a collaborative, cost effective and customer focussed manner.	Noted.

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Hydro Electric Power Distribution plc (SHEPD)		Through the various working groups, SSEN raised concerns about the DNO becoming involved in coordinating works with customers, landlords, meter operators etc. These concerns have been addressed and its our understanding the CMRC will coordinate activities between parties and any quotes for service alterations will be managed through SSEN's current processes and paid for by Alt HAN Co.	
Western Power Distribution	Non-confidential	Yes	Noted.
SSE Energy Supply Ltd	Non-confidential	Yes	Noted.
British Gas	Non-confidential	<p>Yes – we recognise these changes are required in order to facilitate the resolution of Crowded Meter Rooms.</p> <p>BG are currently concerned about the engagement required to deliver a crowded meter room solution and the business case that has been presented to date. Specifically, we are concerned with some of the benefits being claimed. These discussions are taking place elsewhere, outside of this DCUSA change process.</p> <p>We note that the DCUSA change doesn't put any obligation on suppliers (and DNOs) to cooperate with CMR work, which will be necessary. However, we assume these obligations will be addressed elsewhere, potentially in the AltHAN Supplier agreement.</p>	<p>Noted.</p> <p>Alt HAN note that the business case was developed through internal governance links rather than through the DCUSA.</p> <p>WG note that the DCUSA CP does not place an obligation on Suppliers and DNOs to cooperate. These obligations will be addressed elsewhere. Alt HAN advised that this will form part of the</p>

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			process map, appropriate approval/permissions will be sought and the forum will make a decision on whether the works should go ahead.
Northern Powergrid	Non-confidential	Yes	Noted.
<p>Working Group Conclusions:</p> <p>All responders indicated that they are supportive of DCP 400.</p> <p>One response noted that any further work on DNO assets beyond de-energisation would need additional DNO Authorisation and stated that the CP needs to be clearer if this means a fuse to a single exit point (up to 100A or a larger incoming installation providing supplies to several customers. They also noted that they think that sharing BNO information may need to be excluded as it is adding further complication.</p> <p>A couple of respondents were keen to understand more about the engagement required to deliver a crowded meter room solution (coordinating works with customers, landlords, meter operators etc).</p> <p>Further details on the above points can be found in Section 6 of the Change Report.</p>			

Company	Confidential/Anonymous	3. Do you agree that the permitted works for a CMRC detailed in Paragraph 4.7 may be reasonably required to maximise the available space within a meter room or meter cupboard, in order to enable the installation of Relevant Alt HAN Equipment and Smart Metering equipment? Please provide your rationale	Working Group Comments
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Alt HAN Co	Non-confidential	<p>Yes, the proposals specifically seek to address the issue of meter room design and allow for all customers to receive the benefits of a smart metering/Alt HAN installation. In some circumstances there may be a number of 'uncoordinated' installations possible utilising space around some existing meters, however this may simply exacerbate the issue of space constraints and impediments preventing installation of equipment around other sites.</p>	Noted.
Electricity North West	Non-confidential	<p>We agree that most of the work detailed in paragraph [4.7] seems appropriate and the pilot scheme will test whether these permitted works will alleviate the space constraints in most cases and identify whether MEMs would require any additional training to complete these new activities.</p> <p>We do have concerns where paragraph [4.7] refers to work on the cut-out being undertaken by Alt HAN Co or their representatives. Paragraph [4] of Section [4] (Definitions) refers to repositioning of the local cut-out. It needs to be clearer that this does not include the DNO Equipment. We want to ensure there is no room for misinterpretation of the legal text.</p> <p>HAN/WAN communication obligations would sit with Supplier Parties.</p> <p>Much of this equipment will not belong to either a Supplier, MEM or DNO. Most equipment at the service position will belong to the building owner and DCUSA cannot give this broad scope of permission.</p>	<p>Noted.</p> <p>Working Group have changed this to 'local point of isolation'.</p>

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Southern Electric Power Distribution plc (SEPD) & Scottish Hydro Electric Power Distribution plc (SHEPD)	Non-confidential	Yes, I agree the permitted works are reasonable, I would however like to mention that section "4.7 (d) removing, disposing of and replacing aged equipment" is a little ambiguous, we should be clear this should not involve Distribution equipment without DNO involvement.	Working Group have added a note in the legal text to state that this can only happen with the permission of the asset owner.
Western Power Distribution	Non-confidential	Yes	Noted.
SSE Energy Supply Ltd	Non-confidential	Yes. This is on the assumption that the works is associated only with the definition provided in SLC 55 of "Alt HAN Equipment".	Noted.
British Gas	Non-confidential	<p>Only assets owned by the BNO (Building Network Operator) can be removed, and only with the BNO permission. This will likely include fused isolators, physical trunking and cable tray.</p> <p>Supplier owned equipment can be moved around with the Supplier's permission, but nothing can permanently 'leave the wall'. This will include metering and ancillary equipment, such as contactors, time clocks, etc.</p> <p>Nothing can be done by the Shared MOP on the DNO owned equipment, which will be permanently live. The arrangements for getting the DNO to attend on site if needed will depend upon the local DNO/IDNO.</p>	Any equipment removed would require permission of the owner.

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		<p>It isn't clear what happens if the Shared MOP finds an issue with a supplier asset – eg if a supplier asset is accidentally damaged or found to be damaged (eg if when the Shared MOP tries to remove the metering cables, in order to take off the wall, the screws are snapped off, or rusty, and the Shared MOP cannot remove the screws or doesn't have a spare screw for that asset). This will need same day action from the supplier.</p> <p>It also isn't clear what happens if the work potentially causes an issue with a meter. For example what happens if a supplier's meter was found to be no longer working, eg 2 days later after being moved by shared MOP, who would be responsible? How would that flow through of responsibilities work?</p>	<p>Alt HAN note that within the MEM agreement, there would be a number of paths/different liabilities relating to different situations. Alt HAN note that this is contextual depending on the type of damage incurred. This is currently being mapped out. This will also be mapped out in the REC change.</p> <p>Alt HAN note that a quality assurance step will be included at the end of the process to ensure the meter is left safe/operative.</p>
Northern Powergrid	Non-confidential	<p>Yes – but more clarity is required in the terms “local cut-out” and “equipment”.</p> <p>Local cut-out - needs more definition to distinguish it from the primary point of supply cut-out (Exit Point and/or Entry Point) which the CMRC cannot reposition. Describing it as local is a little too vague. Suggestion could be local cut-out - means the secondary cut-out but not the primary Exit/Entry Point cut-out/distribution board.</p>	Addressed above. Removal will be subject to the agreement from equipment owner.

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		Equipment - suggests that whoever is working for the CMRC could decide that some DNO equipment is redundant or aged and so dispose of it without reference to the DNO. For clarity suggest prefixing the word “equipment” with “non –DNO”?	
<p>Working Group Conclusions:</p> <p>All responses indicated that agree that the permitted works for a CMRC detailed in Paragraph 4.7 may be reasonably required to maximise the available space within a meter room or meter cupboard, in order to enable the installation of Relevant Alt HAN Equipment and Smart Metering equipment.</p> <p>A few respondents stated thy have concerns where paragraph [4.7] refers to work on the cut-out being undertaken by Alt HAN Co or their representatives. Paragraph [4] of Section [4] (Definitions) refers to repositioning of the local cut-out. They stated it needs to be clearer that this does not include the DNO Equipment.</p> <p>One respondent stated that it is not clear what happens if the Shared MOP finds an issue with a supplier asset – eg if a supplier asset is accidentally damaged or found to be damaged (eg if when the Shared MOP tries to remove the metering cables, in order to take off the wall, the screws are snapped off, or rusty, and the Shared MOP cannot remove the screws or doesn’t have a spare screw for that asset). They also state that is not clear what happens if the work potentially causes an issue with a meter. For example, what happens if a supplier’s meter was found to be no longer working, eg 2 days later after being moved by shared MOP.</p> <p>One response highlighted that BNO, Supplier and DNO equipment should not be able to be moved or removed without permission.</p> <p>Further details on the above points can be found in Section 6 of the Change Report.</p>			

Company	Confidential/ Anonymous	4. Do you have any comments on the proposed provision of information Clauses set out in Section 2H of the legal text?	Working Group Comments
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Alt HAN Co	Non-confidential	We agree with the legal text as provided.	Noted.
Electricity North West	Non-confidential	<p>Has the UK Revenue Protection Association agreed the proposed reporting, should contact not be possible with the registered electricity supplier?</p> <p>We believe the proposed provision of information in the legal text under section [2H] will generally deliver the intent of this change proposal.</p> <p>We suggest that within the Intro [H] the words 'undertaking' and 'commissioning' are not consistently applied.</p> <p>Definitions: CMR Works - refers to 'repositioning local cut outs/isolation points'. It needs to be clearer that this does not include DNO equipment.</p> <p>Definitions: CMR Works - refers to removing and disposing of redundant trunking and cable trays, redundant and aged equipment.</p> <p>Much of this equipment will not belong to either a Supplier, MEM or DNO. Most will belong to the building owner and DCUSA cannot give this broad scope of permission. Does it need to be restricted to that which is the Responsibility of the Supplier.</p> <p>[52Z.7] Needs to be clearer about what work the CMRC can do on DNO equipment.</p>	<p>The Working note that as consent will be gained ahead of work, there will not be any situations where the electricity Supplier is not contacted.</p> <p>Amended as above.</p> <p>Amended as above.</p> <p>"The Company consents to the Crowded Meter Room Coordinator interfering with the Company's Distribution System to the extent it is</p>

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		<p>[52AA] Appears to be repeating parts of DCUSA. Could this not refer to keep it clear and make future updates more manageable?</p>	<p>necessary to do so in exercising the Crowded Meter Room Coordinator's rights, or complying with its obligations, under this Section 2H. The Crowded Meter Room Coordinator shall not otherwise interfere with the Company's Distribution System"</p> <p>The above statement effectively states that the Crowded Room Coordinator should only undertake works as defined in the Crowded Meter Room Works definition that are necessary.</p> <p>The Working Group notes that DCUSA can repeat certain sections, such as Provision of Information, however these are under each Section that determines a legal relationship and can vary slightly.</p>
<p>Southern Electric Power Distribution plc (SEPD) & Scottish Hydro Electric Power</p>	<p>Non-confidential</p>	<p>No, the provisions provide a route for the CMRC to report service termination defects to the DNO.</p>	<p>Noted.</p>

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Distribution plc (SHEPD)			
Western Power Distribution	Non-confidential	No	Noted.
SSE Energy Supply Ltd	Non-confidential	Yes 52AA.1.3 “Crowded Meter Room Coordinator believes” believes should be changed to “has evidence”	The Working Group agreed that this should remain as it is for consistency.
British Gas	Non-confidential	In 52AA.1.1, the prompt provision of information to the Energy Supplier clearly seems sensible in the three cases listed. However, we are unclear as to the purpose of the final sentence of that paragraph, where the CMRC doesn’t need to do so, if they believed that the Electricity Supplier has caused such circumstance to arrive. There seems to be a typo at the end of 52AA.4, where it refers to “as further described in the remainder of <u>this Clause 52X</u> ”.	The Working Group agreed to leave this section in as it is consistent with other aspects of DCUSA. Corrected.
Northern Powergrid	Non-confidential	No	Noted.
<p>Working Group Conclusions:</p> <p>A majority of respondents were happy with the proposed legal text set out in relation to provision of information.</p>			

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One response asked whether the UK Revenue Protection Association (URPA) agreed the proposed reporting, should contact not be possible with the registered electricity supplier. The Working note that as consent will be gained ahead of work, there will not be any situations where the electricity Supplier is not contacted, however it should be noted that URPA is happy to be notified if the Supplier cannot be identified.

The response also suggested that 52Z.7 should be clearer about what work the CMRC can do on DNO equipment. They also noted that much of this equipment will not belong to either a Supplier, MEM or DNO. Most will belong to the building owner and DCUSA cannot give this broad scope of permission.

Further details in relation to provision of information can be found in Section 6 of the Change Report.

Company	Confidential/ Anonymous	5. Do you agree that the liability clause within Section 2H should follow the same principle as existing DCUSA agreements between DNO, IDNO and Electricity Supplier Parties? If not, Provide your rationale.	Working Group Comments
Alt HAN Co	Non- confidential	Yes	Noted.
Electricity North West	Non- confidential	Yes, applying the existing principles is the best approach.	Noted.
Southern Electric Power Distribution plc (SEPD) & Scottish Hydro Electric Power	Non- confidential	Yes, I agree.	Noted.

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Distribution plc (SHEPD)			
Western Power Distribution	Non-confidential	Yes	Noted.
SSE Energy Supply Ltd	Non-confidential	Yes	Noted.
British Gas	Non-confidential	<p>The cap of £1 million per incident or series of related incidents in 52Z.9 seems low (as this relates to multi dwelling properties, where the risk is presumably higher), but we recognise this is an industry standard figure.</p> <p>As AlTHAN Co is funded by Energy Suppliers, there needs to be some assurance that AlTHAN Co will have appropriate insurance cover in place, rather than the costs of any liability claim being passed back onto Suppliers.</p>	<p>The Working Group acknowledge that the liability cap should be reviewed, however that this is outside the scope of DCP 400.</p> <p>Alt HAN are considering their process for liabilities.</p>
Northern Powergrid	Non-confidential	Yes. The levels of liability may be too low now, but this is out of scope of this change and should be raised as a separate issue.	Noted.
<p>Working Group Conclusions:</p> <p>A majority of respondents agreed that the liability clause within Section 2H should follow the same principle as existing DCUSA agreements between DNO, IDNO and Electricity Supplier Parties.</p> <p>A couple of respondents noted that the levels of liability may be too low but noted that this is an industry standard figure and sits out of scope of this change. One respondent noted that there needs to be some assurance that AlTHAN Co will have appropriate insurance cover in place, rather than the costs of any liability claim being passed back onto Suppliers.</p>			

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Further details in relation to liability Clauses can be found in Section 6 of the Change Report.

Company	Confidential/ Anonymous	6. Do you have any other comments on the proposed legal text for DCP 400?	Working Group Comments
Alt HAN Co	Non-confidential	No	Noted.
Electricity North West	Non-confidential	We believe the legal text would deliver the intent of the change proposal with some clarifications already mentioned above. [4.14] states that CMRC is already a REC accredited MEM, is there a risk of confusion as to what role CMRC are operating under for any specific works?	Noted.
Southern Electric Power Distribution plc (SEPD) & Scottish Hydro Electric Power Distribution plc (SHEPD)	Non-confidential	No.	Noted.
Western Power Distribution	Non-confidential	No	Noted.

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SSE Energy Supply Ltd	Non-confidential	No	Noted.
British Gas	Non-confidential	<p>Can the definition of Customer be confirmed? If there is a flat, rented out to a tenant, then presumably there may be three different Customers: the tenant, the flat owner/landlord, and the owner of the freehold of the property? Is this right? It is quite a challenge to have three customers to contact. Can consent be assumed, if the CMRC has tried to contact all the various parties? 52Z.1 states “Any and all de-energisation Works, Crowded Meter Room Works and Re-energisation Works carried out pursuant to this Section 2H shall only be carried out with the permission of the Customer”</p> <p>You refer in 52Z.3 to the Meter Operation Code of Practice – please note that this is subject to a current change process in REC, to consolidate the various metering codes of practice, so this clause will soon (end 2022?) be out of date. Is it possible to ‘future proof’ it somehow – maybe referring to the Meter Operation Code of Practice (or the combined future REC equivalent).</p> <p>Also, please note in the title above 52Z.3 you say Meter <u>Operator</u> Code of Practice, which is incorrect – it should be the Meter <u>Operation</u> Code of Practice, which you refer to correctly in the text. The text is right, but the title is incorrect.</p> <p>Is 4.2.5 really necessary, given that the definition of the Crowded Meter Room Coordinator already is defined as Alt HAN Co.</p>	<p>The Working Group note that the definition of a customer is included within the legal text.</p> <p>The Working Group acknowledge this point, however agree that it is outside the scope of DCP 400.</p> <p>Corrected.</p> <p>The Working Group agreed to leave this in for consistency within the code.</p>

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		What is the definition of 'Good Industry Practice' in clause 52Z.2?	
Northern Powergrid	Non-confidential	No	Noted.
<p>Working Group Conclusions:</p> <p>One respondent asked for further clarity of the definition of Customer. For example, if there is a flat, rented out to a tenant, then presumably there may be three different Customers: the tenant, the flat owner/landlord, and the owner of the freehold of the property.</p> <p>They also noted the reference to the Meter Operation Code of Practice, advising this is subject to a current change process in REC, to consolidate the various metering codes of practice. The response suggested future proofing. The Working Group agreed that this can be a simple housekeeping change outside of DCP 400.</p> <p>The response also requested a definition of 'Good Industry Practice' in clause 52Z.2.</p> <p>The above has been considered further in Section 6 of the Change Report.</p>			

Company	Confidential/ Anonymous	7. If implemented, do you agree that with the position that Alt HAN Co should not be able to raise CPs and vote on CPs? If not, please provide your rationale.	Working Group Comments
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Alt HAN Co	Non-confidential	Yes. This change is intended to enable Alt HAN Co to undertake works to resolve the cross jurisdictional issues of Crowded Meter Rooms. AHC does not need to be a Party to the DCUSA for any other reason. If DCUSA changes were raised which subsequently impacted the Crowded Meter Room provisions, Alt HAN would engage in the change process and discuss with Energy Suppliers.	Noted.
Electricity North West	Non-confidential	Due to ALT HAN Co's limited scope in DCUSA, we do not feel that it is appropriate for them to raise CP's and vote on CP's.	Noted.
Southern Electric Power Distribution plc (SEPD) & Scottish Hydro Electric Power Distribution plc (SHEPD)	Non-confidential	Yes, I agree that Alt HAN Co should not be able to raise or vote on CPs	Noted.
Western Power Distribution	Non-confidential	Yes	Noted.
SSE Energy Supply Ltd	Non-confidential	Yes	Noted.
British Gas	Non-confidential	This appears to be inconsistent with DCP 394, which would allow a SIP to propose and vote on CPs that impact clauses relevant to them.	The Working Group note that Alt HAN are working on behalf of Suppliers and would therefore be able to raise

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			changes via this route. SIPs will be acting independently and therefore it is appropriate in that case.
Northern Powergrid	Non-confidential	The DCUSA legal text of this DCP400 largely mirrors that of DCP394. However, CP raising and voting rights are not mirrored. If a SIP is allowed to raise changes and vote in the limited scope of section 2G then the same right should be afforded to the CMRC i.e. limited to section 2H.	See previous response.
<p>Working Group Conclusions:</p> <p>All responses except two agreed with the position that Alt HAN Co should not be able to raise CPs and vote on CPs.</p> <p>The other two responses believed that DCP 400 should be consistent with DCP 394 which allows SIPs to raise and vote on relevant changes.</p> <p>The above has been considered further in Section 6 of the Change Report.</p>			

Company	Confidential/ Anonymous	8. Do you agree with the other code changes?	Working Group Comments
Alt HAN Co	Non-confidential	Yes	Noted.
Electricity North West	Non-confidential	Yes	Noted.

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Southern Electric Power Distribution plc (SEPD) & Scottish Hydro Electric Power Distribution plc (SHEPD)	Non-confidential	Yes	Noted.
Western Power Distribution	Non-confidential	Yes	Noted.
SSE Energy Supply Ltd	Non-confidential	Yes	Noted.
British Gas	Non-confidential	These look correct. Do we know when we will have a cost estimate for the R0043 change? That presumably should be incorporated into the Alt HAN CWMR business case. New user roles, etc, are usually quite expensive changes.	Noted. This change is in the process of being assessed and will need to go through solution definition and service provider Impact Assessment to get costs.
Northern Powergrid	Non-confidential	Yes	Noted.
<p>Working Group Conclusions:</p> <p>All responses agreed with the other code changes, as stated in the DCP 400 consultation.</p>			

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Company	Confidential/ Anonymous	9. Have you identified any other changes?	Working Group Comments
Alt HAN Co	Non- confidential	No	Noted.
Electricity North West	Non- confidential	No	Noted.
Southern Electric Power Distribution plc (SEPD) & Scottish Hydro Electric Power Distribution plc (SHEPD)	Non- confidential	No	Noted.
Western Power Distribution	Non- confidential	No	Noted.
SSE Energy Supply Ltd	Non- confidential	No	Noted.

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British Gas	Non-confidential	Are there any REC Data considerations that need to be looked at? Even if the R0043 change is being delayed until after the pilot, the GDPR provisions in REC Main Body 18-20 are likely to be relevant. (Note clauses 19-20 are just in the process of being amended for a DCC aspect related to Faster Switching.)	The Working Group note that REC considerations are to be considered. Regarding GDPR, Alt HAN advise they are envisaging storing identifiable data.
Northern Powergrid	Non-confidential	No	Noted.
<p>Working Group Conclusions:</p> <p>None of the responses identified any other changes, except one which questioned whether any REC data considerations would need to be looked at noting that GDPR provisions within REC may be relevant. This will be captured with the associated REC change.</p>			

Company	Confidential/Anonymous	10. 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.	Working Group Comments
Alt HAN Co	Non-confidential	Yes, we agree with the rationale provided within section 5 of the Consultation document.	Noted.
Electricity North West	Non-confidential	We believe General Objective 4 would be better facilitated by this change as the co-ordination of the work involved promotes efficiency in the implementation and administration of the DCUSA.	Noted.

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Southern Electric Power Distribution plc (SEPD) & Scottish Hydro Electric Power Distribution plc (SHEPD)	Non-confidential	Yes, as described in the CP, general objectives 1-4 are better facilitated.	Noted.
Western Power Distribution	Non-confidential	General Objectives 1 and 2 will be better facilitated through this proposed change. The provision of the CMRC will enable more customers to join the smart meter programme once remedial work is completed, and should remove some workload from network operators. It will also allow better knowledge of building ownership and network boundaries.	Noted.
SSE Energy Supply Ltd	Non-confidential	Yes	Noted.
British Gas	Non-confidential	<p>This change has the potential to help Suppliers meet their smart roll out licence obligations <u>provided</u> all Suppliers (and DNOs) engage in the process, both operationally and specifically surrounding</p> <ol style="list-style-type: none"> 1. The establishment of data sharing provisions referred to in 1.2 (ii), and 2. The contractual set up of the other operational requirements outlined in slide 4 of Attachment 2 to this DCP 400 Change Proposal (the slide called “Crowded Meter Room Coordinator Interface Map”). 	Noted.

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		<p>Therefore, this DCP 400 Change Proposal only includes part of what is required, and without the other elements in place it will not better facilitate any of the DCUSA objectives.</p> <p>We are not clear where the data sharing provisions referred to in 1.2(ii), and these other contractual arrangements, are going to be addressed. The AlTHAN Supplier contract is one option, but this does not also include the DNOs as signatories.</p>	<p>The Working Group acknowledge that the DCUSA change enables the solution rather than mandating the coordination. Other processes will also be in place.</p>
Northern Powergrid	Non-confidential	Yes – for the reasons described in the CP	Noted.
<p>Working Group Conclusions:</p> <p>All responders agreed that the proposal better facilitates the DCUSA General Objectives. One response outlined that the DCP 400 Change Proposal only includes part of what is required, and without the other elements in place it will not better facilitate any of the DCUSA objectives. The Working Group acknowledged that the DCUSA change acts as an enabler rather than mandating the coordination.</p>			

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Company	Confidential/ Anonymous	11. Are you aware of any wider industry developments that may impact upon or be impacted by this CP?	Working Group Comments
Alt HAN Co	Non-confidential	Alt HAN proposed a change to the Retail Energy Code (REC R0043)) in April. This change is intended to allow the Crowded Meter Room Coordinators Shared MOP(s) to utilise the DTN for communications associated with resolution works. This would apply post pilot. In addition, should Alt HAN be required to accede to the REC (which we do not believe is necessary) we would propose to raise this as a separate change to be progressed to allow the pilot to run.	Noted.
Electricity North West	Non-confidential	No	Noted.
Southern Electric Power Distribution plc (SEPD) & Scottish Hydro Electric Power Distribution plc (SHEPD)	Non-confidential	No.	Noted.
Western Power Distribution	Non-confidential	DCP394 - Allow any REC Accredited Meter Operator to De-Energise any Metering Point. This change is set to create the facility for completing the required work identified by the CMRC.	Noted.

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SSE Energy Supply Ltd	Non-confidential	No	Noted.
British Gas	Non-confidential	No	Noted.
Northern Powergrid	Non-confidential	No	Noted.
<p>Working Group Conclusions: Other than referencing DCP 394, the responders were not aware of any wider industry developments that may impact upon or be impacted by this CP.</p>			

Company	Confidential/ Anonymous	12. Do you agree with the Working Group's proposed implementation date? Please provide your rationale.	Working Group Comments
Alt HAN Co	Non-confidential	Yes, as this is an enabling change and not impacting DCUSA systems this change should be implemented outside the traditional release schedule and allow a pilot to run.	Noted.
Electricity North West	Non-confidential	As there isn't a strict timetable for when Authority decisions will be published, would it be more appropriate to provide for an implementation date rather than opting for 10 Working Days following approval?	Working Group discussed and agreed that 10 Working Days following approval is appropriate.
Southern Electric Power	Non-confidential	Yes.	Noted.

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Distribution plc (SEPD) & Scottish Hydro Electric Power Distribution plc (SHEPD)			
Western Power Distribution	Non-confidential	The implementation date is acceptable as long as any DTN updates are in place at the same time.	Noted.
SSE Energy Supply Ltd	Non-confidential	No We believe the implementation date should run in tandem, with the REC R0043 implementation timeline.	Noted.
British Gas	Non-confidential	As explained in our answer to 10 above, this is only one part of what is needed for the CWMR pilot to go ahead. We are happy for this element of the requirements to be implemented as soon as possible, but note there are other extensive requirements needed in addition to this.	Noted.
Northern Powergrid	Non-confidential	Yes	Noted.
<p>Working Group Conclusions:</p> <p>All responses except for two agreed with the proposed implementation date. One response suggested that as there is not a strict timetable for when Authority decisions will be published it could be more appropriate to provide for an implementation date rather than opting for 10 Working Days following approval. Another response stated the believe the implementation date should run in tandem with the REC R0043 implementation timeline.</p>			

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Further details in relation to the implementation date can be found in Section 9 of the Change Report.