

DCUSA Change Report		At what stage is this document in the process?
<h1 data-bbox="119 353 550 448">DCP 400</h1> <h2 data-bbox="119 488 1109 766">Commissioning of Works using shared Meter Operator services by the Crowded Meter Room Coordinator</h2> <p data-bbox="119 790 542 828"><i>Date raised: 21 January 2022</i></p> <p data-bbox="119 846 375 884"><i>Standard Change</i></p>	<div data-bbox="1182 347 1348 414">01 – Change Proposal</div> <div data-bbox="1182 472 1412 504">02 – Consultation</div> <div data-bbox="1182 566 1348 633">03 – Change Report</div> <div data-bbox="1182 674 1348 741">04 – Change Declaration</div>	
<p data-bbox="119 929 566 967">Purpose of Change Proposal:</p> <p data-bbox="119 985 1404 1097">DCP 400 seeks to allow Alt HAN Co, acting as a Crowded Meter Room Co-ordinator to commission necessary works, using a shared Meter Equipment Manager, to resolve meter room issues to enable the installation of Smart and Alt HAN equipment.</p>		
	<p data-bbox="239 1137 1436 1332">This document is issued in accordance with Clause 11.20 of the DCUSA, and details DCP 400 ‘Commissioning of Works using shared Meter Operator services by the Crowded Meter Room Coordinator’. Parties are invited to consider the proposed amendment (Attachment 1) and submit their votes using the Voting form (Attachment 2) to dcusa@electralink.co.uk by 31 October 2022.</p> <p data-bbox="239 1355 1404 1467">The voting process for the proposed variation and the timetable of the progression of the Change Proposal (CP) through the DCUSA Change Control Process is set out in this document.</p> <p data-bbox="239 1489 1420 1601">If you have any questions about this paper or the DCUSA Change Process, please contact the DCUSA by email to dcusa@electralink.co.uk or telephone 020 7432 3011.</p>	
	<p data-bbox="239 1641 853 1680">Parties Impacted: DNOs, IDNOs, Suppliers</p>	
	<p data-bbox="239 1758 1436 1948">Impacted Clauses: Amendments to Section 1A - Clause 1 ‘Definitions’ and Clause 4 ‘Accession of Additional Parties’, Section 1B – Clause 6 ‘Panel Members’ and Clause 8 ‘Costs of the DCUSA’, Section 1C – Clause 10 ‘Change Proposals’ and Clause 12 ‘Voting’ as well as the Introduction of new Section 2G (Clauses 52V-52X) and amendment to Schedule 9 ‘Accession Agreement’</p>	

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Any questions?

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Timetable

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

Change Proposal timetable

Activity	Date
Initial Assessment Report	16 February 2022
Consultation Issued to Industry Participants	05 July 2022
DCP 400 briefing session	18 July 2022
Change Report Approved by Panel	07 October 2022
Change Report issued for Voting	10 October 2022
Party Voting Closes	31 October 2022
Change Declaration Issued to the Authority	01 November 2022
Authority Decision	TBC
Implementation	If approved, 10 Working Days after Authority decision

1 Executive 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, it is believed that the following additional changes will be necessary:
 - (i) That Alt HAN Co becomes a signatory to the DCUSA; and
 - (ii) Data sharing provisions are established between Alt HAN Co as the Crowded Meter Room Co-ordinator, Suppliers and Distributors (Distributor means a DNO or IDNO) for the purposes of identifying BNOs, landlords/owners¹.

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, to enable the installation of Smart and Alt HAN equipment allowing smart benefits to flow to those consumers. This solution has emerged from previous analysis and consultation in 2020 and 2021 to explore the issues associated with physical impediments to installing Alt HAN or Smart Metering equipment. A coordinated solution was identified as the most efficient approach to address the issues and a Target Operating Model (TOM) developed in advance of bringing forward any code change. This can be found within Attachment 3.
- 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 Distributors) and jurisdictions minimising the number of aborted installations, and associated smart abort costs, for 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 Distributors in being able to access the data needed to resolve issues with building access and contacts for permission for works.

¹ There will need to be agreed means of communication between the Crowded Meter Room Co-ordinator and Suppliers, Distributors, and landlords for specific activities within the Target Operating Model that will sit outside these DCUSA arrangements.

How?

- 1.6 This change would amend the DCUSA to allow Alt HAN Co Ltd, acting as the Industry Coordinator on behalf of Suppliers to orchestrate resolutions in a Crowded Meter Room by coordinating with capable resolving parties (Suppliers, Distributors, BNOs and landlords) and using a Shared MOP for commissioning the necessary assessment of the meter room issues and, where it is economic to do so, instruct resolution works. In doing so, the Crowded Meter Room Co-ordinator would accept liability for such works on behalf of Suppliers (for which the Crowded Meter Room Co-ordinator will need to become a DCUSA Party). Alt HAN will initially conduct a pilot of the Crowded Meter Room Coordination.

2 Governance

Justification for Part 1 Or Part 2 Matter

- 2.1 DCP 400 is classified as a Part 1 matter and therefore will go to the Authority for determination after the voting process has completed.
- 2.2 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).

Requested Next Steps

- 2.3 The Panel considered that the Working Group has carried out the level of analysis required to enable Parties to understand the impact of the proposed amendment and to vote on DCP 400.
- 2.4 The DCUSA Panel recommends that this CP:
- be issued to Parties for voting

3 Why Change?

Background of DCP 400

What is Alt HAN?

- 3.1 Suppliers are obligated to take all reasonable steps to install smart meters in GB domestic and smaller non-domestic premises. A smart metering installation will include gas and electricity smart meters, an In-Home Display (IHD or in many cases a Pre-Payment Metering Interface Device (PPMID) may be provided) and a Communications Hub (CH). Within the customer's premises, these Devices will communicate with each other via a Home Area Network (HAN). However, in some premises there is a HAN Coverage 'gap' and this will require additional equipment to extend the range of the HAN in order to connect all of the smart metering devices to the customer premises.

3.2 Alt HAN Co was established to allow Suppliers to collectively meet their obligations in licence and under Section Z of the Smart Energy code (SEC) to resolve the HAN coverage gap. The Alt HAN solution utilises equipment known as Alt HAN Bridges to establish the HAN. One of the Alt HAN Bridges is always wired at the electricity meter and therefore sufficient space is required around that meter to install the Alt HAN Bridge.

What is a Crowded Meter Room?

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

3.4 In some buildings the Home Area Network (HAN) cannot extend from the ESME to the customer property. In this instance a Supplier could utilise the Alt HAN solution. However there needs to be sufficient space to install the necessary equipment (an ESME and the Alt HAN Wired Bridge Device) to establish a HAN with the associated premises in the building (Multi Dwelling Units (MDU)), or any associated remote Gas Meter Points (GSME / MPRNs).

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

3.6 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.

3.7 A change to DCUSA is required to allow Alt HAN Co, 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).

3.8 Consent could be obtained from all licensed electricity Distributors and from all licensed electricity Suppliers by amending the DCUSA.

3.9 In addition, consideration should be given to the opportunity for data sharing between the Crowded Meter Room Co-ordinator and Distributor over who the BNO and or/landlords are for particular buildings.

4 Initial Working Group Analysis – Pre Consultation

DCP 400 Working Group Assessment

- 4.1 The DCUSA Panel established a Working Group to assess DCP 400. This Working Group consists of DNO, Supplier, AMO, NAPIT, ENA, Alt HAN, Retail Energy Code (REC) and Electrical Safety First 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 As stated above, DCP 400 seeks to amend DCUSA to provide the necessary legal permissions to allow Alt HAN Co, acting as a Crowded Meter Room Coordinator (CMRC), to be permitted by DCUSA parties to commission works to resolve CMRs using a REC accredited MEM. This CP seeks to put in place the necessary legal relationship between Alt HAN Co, Distributors and Suppliers. The below paragraphs will detail what this legal relationship will look like.

Introduction to Crowded Meter Rooms

- 4.3 A CMR, is a term given by the Alt HAN Co Crowded Meter Room Project to represent a Meter Room or Meter Cupboard in a Multi Dwelling Unit (MDU / Building containing multiple premises) that contains a spatial constraint that prevents the standard installation of the proposed Alt HAN Equipment alongside the electricity meters thus preventing the ability to extend the HAN to the customers premises. In some cases, the same spatial constraints are true for the standard installation of SMETS2 Smart Meters themselves, regardless of the need for Alt HAN Equipment.
- 4.4 The constraints may be, for example, the close collocation of Meters, the proximity of Trunking, Cut-Outs, Distribution Equipment, Risers, Customer Equipment, other Building Infrastructure, and the Building Fabric itself. These constraints may sit in different jurisdictions of accountability, such as DNO, BNO, Energy Supplier or Customer.
- 4.5 Whilst the makeup of Meter Room and Meter Cupboards are generally unique across GB, the definition of a Crowded Meter Room scenario suggests a situation of Vertical or Horizontal Obstructions (such as Trunking, Cut-Outs, Isolation Switches, Risers, Distribution Equipment and Customer Owned Equipment or other Building Infrastructure) that produce a spatial constraint that prevents the straightforward installation of Alt HAN Equipment, and in some cases SMETS2 Meters and Comms Hubs. The resolution of these issues may sit across multiple jurisdictions of Suppliers, MOPs, Distributors, BNOs, landlords and Customers.
- 4.6 DCP 400 seeks to amend DCUSA to provide the necessary legal permissions to allow Alt HAN Co, acting as a Crowded Meter Room Coordinator (CMRC), to be permitted by DCUSA parties to commission works to resolve CMRs via a REC-accredited Meter Equipment Manager (MEM).

Scope of Works

- 4.7 The Working Group discussed the scope of work that Alt HAN Co should be able to undertake when acting as a CMRC. The Working Group believe the work should include the following:
- (a) repositioning meters, cabling, local cut outs/isolation points and customer isolation switches;

- (b) removing and disposing of inhibitive trunking and cable trays;
- (c) removing and disposing of redundant equipment; and/or
- (d) removing, disposing of and replacing aged equipment.

4.8 The Working Group believe that the above works 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/or Smart Metering equipment. This CP will facilitate the necessary DCUSA updates to establish the legal relationship between Alt HAN Co, Distributors and Suppliers.

Original Proposal - New Section 2H of DCUSA (Now to be Section 2G, additional details later in this Change Report)

4.9 It is proposed that there will be a new Section 2H added to DCUSA. This Section will set out the terms and conditions pursuant to which each DNO/ IDNO Party and each Supplier Party shall allow the Crowded Meter Room Coordinator to undertake Crowded Meter Room Works.

4.10 This new Section will set out the following:

- Crowded Meter Room Works will be defined as below:
 - means works which are 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/or Smart Metering equipment, including:
 - (a) repositioning meters, cabling, local cut outs/isolation points and customer isolation switches;
 - (b) removing and disposing of inhibitive trunking and cable trays;
 - (c) removing and disposing of redundant equipment; and/or
 - (d) removing, disposing of and replacing aged equipment.
- Work is limited to Whole Current Metering only
- Any and all de-energisation Works, Crowded Meter Room Works and Re-energisation Works carried out pursuant to Section 2H shall only be carried out with the permission of the Customer.
- Section 2H will not imply any permission by the Customer (i.e., permission of the customer will always need to be pursued separately) and will make clear that the works pursuant to Section 2H are not undertaken on behalf of the Distributor. The CMRC must make clear to the Customer (and to the occupier if different) that the CMRC is not acting on behalf of the Distributor.
- The CMRC shall act in accordance with Good Industry Practice when carrying out, or procuring the carrying out of, any and all works pursuant to Section 2H.
- The CMRC shall only be entitled to exercise rights under Section 2H via a contractor which is accredited as a Meter Equipment Manager under the Retail Energy Code. The CMRC shall ensure that all of its contractors which undertake works pursuant to this Section 2H do so in compliance with the Retail Energy Code (REC) Meter Operation Code of Practice.

- Section 2H will state that if the CMRC wishes at any time to undertake Crowded Meter Room Works, consent is given from the DNO, IDNO and Supplier Parties provided that the CMRC's Shared MOP Re-energises that Exit Point and/or Entry Point as soon as reasonably practicable thereafter.
- Section 2H will state the CMRC's Shared MOP shall only be entitled to Re-energise an Exit Point and/or Entry Point that has been De-energised by (or on behalf of) the CMRC pursuant to Section 2H (i.e. if found De-energised then no Re-energisation works will be carried out).
- Section 2H will state that DNO, IDNO and Supplier Parties consent to the CMRC interfacing with their equipment to the extent it is necessary to do so in exercising the CMRC's rights, or complying with its obligations, under Section 2H. The CMRC shall not otherwise interfere with their equipment.
- Provision of information to the Distributer and Supplier (detailed further below)
- A liability clause (detailed further below)

Provision of Information to DNO, IDNO and Electricity Supplier Parties

- 4.11 The CMRC will eventually need to have the ability to send communications to the DNO and the Registered Supplier using Market Messages (DTC flows) over the Data Transfer Network. This will require the CMRC to be set up as a new Role Code, and for the relevant Market Messages to include new Scenario Variants where the CMRC will send and receive information between the CMRC and the Registered Supplier and/or the DNO/ IDNO. To enable this, some system changes will be required and this is being captured within a corresponding REC Change R0043.
- 4.12 However for the purposes of the initial pilot Alt HAN will need to utilise a separate mechanism for communications that does not depend on the R0043 change.
- 4.13 Section 2H of DCUSA will stipulate what information should be provided to DNO, IDNO and Electricity Supplier Parties.
- 4.14 The CMRC will be expected to report any dangerous incidents and damage to the relevant DNO/ IDNO Party as they currently do now as a REC accredited MEM. If this is a Category A situation, then the CMRC will ensure that the DNO/ IDNO is notified by telephone in a prompt and appropriate manner having regard to the nature of the incident to which the report relates.
- 4.15 Where the CMRC comes across any matter or incident that is a Category B Situation, then the CMRC shall ensure that the DNO/ IDNO is notified of such report or enquiry using the Market Message MM00023 (Data Transfer Network - data flow D0135), except for the pilot where an alternative means of communication will be used. As stated above the REC Change R0043 will make changes to the Market Messages to allow for a CMRC to be set up as a new Role Code to enable these flows to be sent.
- 4.16 The DCUSA will also place an obligation on the CMRC to notify the Electricity Supplier where the following occurs:
- the flow of electricity through an Exit Point has been interrupted (and remains interrupted);

- there has been interference with any electricity metering equipment that has prevented such metering equipment from correctly registering the quantity of electricity supplied; and/or
- the electricity metering equipment otherwise presents a danger,

4.17 The provision of information Clauses are set out in Section 2H, within the legal text (Attachment 1).

Liability

4.18 Section 2H will state that the CMRC shall indemnify DNO, IDNO and Electricity Supplier Parties against all actions, proceedings, costs, demands, claims, expenses, liability, loss or damage arising directly from physical damage to the property of any person caused by the CMRC in exercising the CMRC's rights under Section 2H (but excluding liability for any loss of profit, loss of revenue, loss of use, loss of contract or loss of goodwill, and subject to a cap of £1 million per incident or series of related incidents).

4.19 Within DCUSA there is an existing liability clause between Distributors and Suppliers in relation to working on each other's assets. The suggestion within Paragraph 4.18 above follows the same principle.

4.20 The full legal Text for DCP 400 can be found in Attachment 1.

Acceding to DCUSA to act as the CMRC

4.21 As stated above, it is proposed that Alt HAN Co accede to DCUSA to allow them to act as a CMRC to undertake the works identified in Paragraph 4.7. Alt HAN Co will only need to accede to the Clauses relevant to DCP 400 and will not need to contribute to any DCUSA related costs and will not need to become DCUSA Panel or Board members.

4.22 When acceding to DCUSA Alt HAN Co would need to provide the following information:

- Company Name
- Registration Number
- Registered Address
- Principle Operating Address
- Contract Manager (a primary contact for DCUSA related matters)
- Contract Manager Telephone Number
- Contract Manager Email Address

Raising Changes and Voting Rights

4.23 If this CP is implemented, it is not envisioned that Alt HAN Co will have the ability to raise CPs or vote on CPs. Impacted DCUSA Parties (Distributors and Suppliers) can bring changes forward to DCUSA if there is a need to address any impacts to Alt HAN.

Other Code Changes - Retail Energy Code

Provision of Information

- 4.24 As mentioned above, REC Modification R0043 will make the necessary amendments to ensure that the CMRC is set up as a new Role Code, and for the relevant Market Messages to include new Scenario Variants where the CMRC will send and receive information between the Registered Supplier and/or the DNO/IDNO.
- 4.25 For the purposes of any pilot activity the CMRC will utilise other means of communication that do not rely on the R0043 changes.
- 4.26 In the event that legal advice determines that Alt HAN Co needs to also accede to the REC then this will be progressed as a separate change

5 DCP 400 Consultation

- 5.1 The DCP 400 consultation was issued on 05 July 2022 and there were 7 responses received. 2 responses received were from Supplier Parties, one was from Alt HAN, and the remaining responses were provided from DNO Parties.
- 5.2 A summary of the responses received, and the Working Group's conclusions are set out below. The full set of responses and the Working Group's comments are provided in Attachment 4.

Question 1 - Do you understand the intent of DCP 400?

- 5.3 All responders indicated that they understand the intent of the DCP.
- 5.4 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.

Question 2 – Are you supportive of the principles of DCP 400?

- 5.5 All responders indicated that they are supportive of DCP 400.
- 5.6 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.
- 5.7 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).
- 5.8 Further details on the above points can be found in Section 6 of this Change Report.

Question 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

- 5.9 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.
- 5.10 A few respondents stated they had concerns where the consultation document referred to work on the cut-out being undertaken by Alt HAN Co or their representatives. The Crowded Meter Room Works definition as consulted on referred to repositioning of the local cut-out. They stated it needed to be clearer that this does not include the DNO Equipment.
- 5.11 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.
- 5.12 One response highlighted that BNO, Supplier and DNO equipment should not be able to be moved or removed without permission.
- 5.13 Further details on the above points can be found in Section 6 of this Change Report.

Question 4 - Do you have any comments on the proposed Provision of information Clauses set out in Section 2H of the legal text?

- 5.14 A majority of respondents were happy with the proposed legal text set out in relation to provision of information.
- 5.15 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.
- 5.16 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.
- 5.17 Further details in relation to provision of information can be found in Section 6 of this Change Report.

Question 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.

- 5.18 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.
- 5.19 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.
- 5.20 Further details in relation to liability Clauses can be found in Section 6 of this Change Report.

Question 6 - Do you have any other comments on the proposed legal text for DCP 400?

- 5.21 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.
- 5.22 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.
- 5.23 The response also requested a definition of 'Good Industry Practice' in clause 52Z.2.
- 5.24 The above has been considered further in Section 6.

Question 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.

- 5.25 All responses except two agreed with the position that Alt HAN Co should not be able to raise CPs and vote on CPs.
- 5.26 The other two responses believed that DCP 400 should be consistent with DCP 394 which allows SIPs to raise and vote on relevant changes.
- 5.27 The above has been considered further in Section 6.

Question 8 - Do you agree with the other codes changes?

- 5.28 All responses agreed with the other code changes, as stated in the DCP 400 consultation.

Question 9 - Have you identified any other changes?

- 5.29 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.

Question 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.

5.30 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.

5.31 A summary of the responses can be found in the table below. The view of the Working Group is contained within section 7.

Respondent	Objective 1	Objective 2	Objective 3	Objective 4	Objective 5	Overall Stance
1.	Positive	Positive	Positive	Neutral	-	Does better facilitate the objectives
2.	-	-	-	Positive	-	Does better facilitate the objectives
3.	Positive	Positive	Positive	Neutral	-	Does better facilitate the objectives
4.	Positive	Positive	-	-	-	Does better facilitate the objectives
5.						Noted overall agreement that the proposal better facilitates the DCUSA General Objectives
6.						Highlighted that DCP 400 Change Proposal only includes part of what is required
7.	Positive	Positive	Positive	Neutral	-	Does better facilitate the objectives

Question 11 - Are you aware of any wider industry developments that may impact upon or be impacted by this CP?

5.32 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.

Question 12 - Do you agree with the Working Group's proposed implementation date? Please provide your rationale.

- 5.33 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.
- 5.34 Further details in relation to the implementation date can be found in Section 9 of this Change Report.

6 Working Group Conclusions and Final Solution

6.1 After consideration of the consultation responses, the Working Group identified the following areas for further consideration:

- Engagement required to deliver a crowded meter room solution
- Scope of Works
- Removal of equipment
- Communication with the Supplier
- Permission from BNOs
- Provision of Information
- DNO/CMRC data sharing
- Liability Clauses (Alt HAN Insurance)
- Customer Permissions
- Good Industry Practice
- Ability to raise CPs
- Alt HAN Pilot
- Implementation date (See Section 9).

Engagement required to deliver a crowded meter room solution

6.2 The CMR Target Operating Model (see Attachment 3) sets out the need to coordinate activity across participating Suppliers, landlord/BNO, AHC, the CMR Shared MOP and Distributor (where needed) in the progression of CMR activity. Work will only proceed where the relevant resolving Parties have engaged with the process (e.g. if access to a meter room cannot be obtained then the initial survey cannot proceed). The expectation is that not all CMR building will be resolvable and therefore physical works will only occur where it is cost effective to do so. Works will be coordinated by the Shared MOP as the primary contractor. Engagement with residents/end customers will be subject to coordinated communications agreed between the resolving parties and form part of a go/no go decision for works to proceed.

- 6.3 DCP 400 acts as an enabler by allowing Alt HAN Co, acting as a Crowded Meter Room Co-ordinator to commission necessary works, using a shared Meter Equipment Manager. In Particular, DCP 400 sets out the Crowded Meter Room Works which are 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/or Smart Metering Systems. As stated above, there will be full engagement with all relevant parties before any Crowded Meter Room Works take place. Any work required outside of the definition of Crowded Meter Room Works will require further permission from the relevant DNO or Supplier.

Scope of Works

- 6.4 The role of the CMRC is to understand the scope of works required and liaise with the Resolving Parties to understand the full costs of resolution. It is only where the costs of undertaking any works is agreed that work would proceed.
- 6.5 DCP 400 will put an agreement in place with DNO Parties, Supplier Parties and the Crowded Meter Room Coordinator detailing what Crowded Meter Room Works are permitted.
- 6.6 As stated above, a few respondents stated they had concerns where the consultation referred to work on the cut-out being undertaken by Alt HAN Co or their representatives. The Crowded Meter Room Works definition as consulted on referred to repositioning of the local cut-out. They stated it needs to be clearer that this does not include the DNO Equipment.
- 6.7 After review, the Working Group agreed to replace “local cut outs/isolation points” in the definition with “local points of isolation”.
- 6.8 Where the CMRC undertakes works the main activity is intended to be the relocation of meters to optimise a meter room for smart and Alt HAN installations. Any redundant equipment will only be removed with the relevant permission (e.g. a DNO will remove its equipment if necessary and the landlord may wish to have equipment (e.g. trunking) replaced, if aged, or to retain). Meters are not to be removed except where an emergency replacement occurs, in which existing industry processes will be followed. After discussions with the DCUSA legal advisors, a decision was made to remove from the scope of works the following “removing, disposing of and replacing aged equipment (it should be noted that this will only be done with the permission of the asset owner).
- 6.9 The update definition is detailed below:

Crowded Meter Room Works

means works which are 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/or Smart Metering Systems, including:

- (a) De-energise an Entry/Exit Point;
- (b) repositioning meters, cabling, local points of isolation and customer isolation switches;
- (c) removing and disposing of inhibitive trunking and cable trays;
- (d) removing and disposing of redundant equipment; and/or

(e) Re-energise an Entry/Exit Point;

6.10 Any other work required outside of the scope above will need further approval from the relevant DNO or Supplier Party. For example, if DNO works are required to remove, reposition or replace equipment then the CMRC will liaise with the relevant DNO, through their established processes, to quote for works and where resolution is agreed, to coordinate works and customer messaging..

Communication with the Supplier

6.11 The CMR Target Operating Model (see Attachment 3) sets out the need to work with Suppliers throughout the end to end processes and has steps to confirm the Supplier is aware a building with their meter point is subject to CMR assessment, that they remain the registered Supplier, that they confirm knowledge (where known) of the needs of any vulnerable customers that would need to be considered in assessing whether a CMR can be resolved, that they participate in customer communications (or are aware of the communications sent, where they delegate this responsibility), are aware of issues that arise related to equipment inspection, that they receive confirmation of when works are complete (or that those premises will be subject to an Exempt Premises List application) and that smart installations can now be made using a copy of the updated meter room design. It is important to note that a CMR building may not be subject to physical resolution works and we anticipate that a number will be unresolvable for reasons of access, safety or cost.

Permission from BNOs

6.12 The CMR Target Operating Model sets out the need to work with the building owner, landlord/BNO for the purposes of ensuring access and agreement to any works associated with meter room re-design. It will be the responsibility of the CMRC to establish permissions and agreements which will sit outside of energy industry governance as these do not bind BNOs/landlords. Practically, where agreement with landlords/BNOs cannot be reached or contact is unable to be established then no work will be undertaken by the CMRC and this would be logged as such for future reference. It is important to note that a CMR building may not be subject to physical resolution works and it is anticipated that a number will be unresolvable for reasons of access, safety or cost.

Provision of Information

6.13 As stated above, there will be ongoing communications with Suppliers and Distributors up to the point where a decision is made on whether physical resolution works can be undertaken.

6.14 Where Crowded Meter Room Works take place, DCP 400 will put obligations on the CMRC to communicate with Distributors and Suppliers as below:

Suppliers

6.15 The DCUSA will place an obligation on the CMRC to notify the Electricity Supplier where the following occurs:

- the flow of electricity through an Exit Point has been interrupted (and remains interrupted);

- there has been interference with any electricity metering equipment that has prevented such metering equipment from correctly registering the quantity of electricity supplied; and/or
- the electricity metering equipment otherwise presents a danger,

Distributors

- 6.16 The CMRC will be expected to report any dangerous incidents and damage to the relevant DNO/ IDNO Party as they currently do now as a REC accredited MEM. If this is a Category A situation, then the CMRC will ensure that the DNO/ IDNO is notified by telephone in a prompt and appropriate manner having regard to the nature of the incident to which the report relates.
- 6.17 Where the CMRC comes across any matter or incident that is a Category B Situation, then the CMRC shall ensure that the DNO/ IDNO is notified of such report or enquiry, within five working days. The legal text will state that they should do so by using the Market Message MM00023 (Data Transfer Network - data flow D0135), unless agreed otherwise by the Supplier or Distributor that an alternative means of communication will be used (i.e. for the proposed pilot).

Crowded Meter Room Pilot and Enduring Solution

- 6.18 This DCUSA change is an enabling change that establishes the ability to stand up a CMRC, subject to the provisions set out in the DCUSA. The decision as to whether to fund and formally establish a CMR rests with the Alt HAN Forum. The DCUSA change does not mean that a CMRC will be established. The Alt HAN Forum will first consider whether to commission a pilot of the CMRC. This decision relies on a review of the Outline Business Case, completion of a procurement to establish MOP capability, establishing the Alt HAN resources and confirmation that the necessary regulatory changes are approved that enable a CMRC.
- 6.19 As stated above the REC Change R0043 will make changes to the Market Messages to allow for a CMRC to be set up as a new Role Code to enable these flows to be sent. Prior to this change being made, there is consideration of running a pilot. If this pilot takes place, it is anticipated that an alternative form of communications will be needed and this will be agreed between the participating parties.

DNO/ CMRC data sharing

- 6.20 The CMR works envisages a benefit associated with information sharing between DNOs and the CMRC with regards to building, landlord, BNO and meter room access related information. Where such information is held by either Party this will support efficient access to enable progression of discussion over potential works or to help meet wider obligations.

Liability Clauses

- 6.21 As mentioned in Section 5, 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, however 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.

- 6.22 The Working Group acknowledge the comments raised in relation to current liability levels, but agreed that any changes to these sits out of scope of DCP 400. Given that the caps were set a long time ago, it may be sensible to consider increasing the caps for all parties, through a separate CP.
- 6.23 One consultation respondent noted that there needs to be some assurance that Alt HAN Co will have appropriate insurance cover in place, rather than the costs of any liability claim being passed back onto Suppliers. Alt HAN Co has insurance in place that covers its operational activities and services. The contract with a Shared MOP includes liabilities associated with claims arising from damages resulting from errant actions of the MOP.

Customer Permissions

- 6.24 The CMRC Target Operating Model requires confirmation of communications with customers/tenants/residents. This is only when it is determined it is viable to undertake a future resolution of a CMR. In advance of any resolution works the CMRC will work with participating Suppliers, the landlord and participating Suppliers (and the Distributor if they are required to undertake works) to ensure a consistent set of communication to the tenant/resident. Communications will include an explanation that works will be carried out and the duration that the customer will experience any disruption to power. In addition, the communication will identify contact details for a tenant/resident to notify if there are any particular needs that need to be considered (this would be in addition to an earlier check regarding vulnerable customer information available via DNO, Supplier or landlord). It may be necessary for the CMRC to establish direct contact with customers during the initial survey, where insufficient information is available regarding specific customer needs.

Good Industry Practice

- 6.25 As stated above, one respondent requested the definition of Good Industry Practice within Section 2H. it should be noted that DCUSA already contains a definition as below:

Good Industry Practice

means the exercise of that degree of skill, diligence, prudence and foresight which would reasonably and ordinarily be expected from a skilled and experienced operator engaged in the same type of undertaking under the same or similar circumstances.

Ability to raise CPs

- 6.26 As stated in Section 5, all responses except two agreed with the position that Alt HAN Co should not be able to raise CPs and vote on CPs.
- 6.27 Alt HAN Co has been established as a delivery vehicle to allow Suppliers to meet their licence obligations with regards to the Alternative HAN requirements. Any decision to seek changes to DCUSA should be at the direction of the Alt HAN Forum. For this reason, should a change be sought it is proposed that a Forum member, who would already be a DCUSA Party could sponsor any change. This is distinct from the concept of a DCP 394 and a Safe Isolation Provider (SIP) who is not operating under the direction of existing industry governance.

Post Legal Text Review

6.28 It should be noted that throughout the development of this CP, the legal text had been produced on the basis that DCP 394 would be implemented ahead of DCP 400. As both are intending on creating a new sub-section of Section 2 (i.e., Section to 2G and 2H) the Working Group had referenced the creation of Section 2H for this CP. However, whilst drafting this Change Report, it has become clear that it is much more likely that DCP 400 will be implemented ahead of DCP 394 and as such, all references to Section 2H should be treated as references to Section 2G and the corresponding Clause numbers adjusted to Clauses 52V to 52X rather than 52Y to 52AA.

7 Relevant Objectives

Assessment Against the DCUSA Objectives

7.1 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 400 will be measured against the DCUSA General Objectives, which are set out in the table below:

DCUSA General Objectives	Identified impact
<input checked="" type="checkbox"/> 1 The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks	Positive
<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 checked="" type="checkbox"/> 3 The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences	Positive
<input checked="" type="checkbox"/> 4 The promotion of efficiency in the implementation and administration of the DCUSA	Neutral
<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

7.2 The Working Group position is 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.

- 7.3 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.
- 7.4 The Working Group notes that DCP 400 acts as an enabler. The decision and oversight of the CMRC is subject to Alt HAN governance and REC changes may be required to support the operation of a CMRC. A full CMRC service will only work with the full participation of the relevant Suppliers. Landlord/BNOs and, where needed, Distributors.

8 Impacts & Other Considerations

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

8.1 N/A

Does this Change Proposal Impact Other Codes?

- BSC
- CUSC
- Grid Code
- DCode
- SEC
- REC
- None

8.2 As mentioned in previous sections of this Change Report, an impact on the REC has been identified and has been picked up via REC Modification R0043. R0043 will make the necessary amendments to ensure that a new Role Code is set up for the CMRC, and for the relevant Market Messages to include new Scenario Variants where the CMRC will send and receive information between the Registered Supplier and/or the relevant DNO/IDNO.

Consideration of Wider Industry Impacts

8.3 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.

- 8.4 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.
- 8.5 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.
- 8.6 Data sharing between the Crowded Meter Room Co-ordinator and Distributor over BNOs and/or landlords information should assist in the speedy resolution of issues with access to buildings and future works.

Confidentiality

- 8.7 This Change is not confidential.

9 Implementation

- 9.1 It is proposed that this CP should be implemented 10 Working Days after Authority approval.

10 Legal Text

- 10.1 The legal text for DCP 400 has been reviewed by the DCUSA legal advisors and is provided as Attachment 1.
- 10.2 The legal text contains the following amendments/additions:
- Section 1A –
 - Clause 1 ‘Definitions’ to amend the definitions for Company, Customer, De-Energise, Electricity Supplier, Party Category, Re-energise and the addition of definitions for Crowded Meter Room Coordinator and Crowded Meter Room Works.
 - Deletion of some repetitive text within the definition of Re-Energise
 - Clause 4 ‘Accession of Additional Parties’ to include a restriction on who can be the CMRC.
 - Section 1B –
 - Clause 6 ‘Panel Members’ to state that as the CMRC Party will not be considered as a separate Party Category that it will not have a seat allocated for a DCUSA Panel member.
 - Clause 8 ‘Costs of the DCUSA’ to state that the CMRC Party will not be liable for the costs of the DCUSA.
 - Section 1C –

- Clause 10 'Change Proposals' to state that as the CMRC Party will not be considered as a separate Party Category that it will not have the ability to raise Change Proposals.
- Clause 12 'Voting' to state that as the CMRC Party will not be considered as a separate Party Category that it will not have the ability to participate in the Voting Procedure.
- Introduction of new Section 2G (Clauses 52V-52X) for the contractual provisions related to Distributor/Supplier To Crowded Meter Room Coordinator Relationships.
- Schedule 9 'Accession Agreement' to add context around the reasons for Crowded Meter Room Coordinator agreeing to accede to the DCUSA.

11 Code Specific Matters

Modelling Specification Documents

11.1 N/a

Reference Documents

11.2 N/a

12 Recommendations

Panel's Recommendation

- 12.1 The Panel approved this Change Report on 07 October 2022. The Panel considered that the Working Group has carried out the level of analysis required to enable Parties to understand the impact of the proposed amendment and to vote on DCP 400.
- 12.2 The Panel have recommended that this report is issued for Voting and DCUSA Parties should consider whether they wish to submit views regarding this Change Proposal.

13 Attachments

- Attachment 1 - DCP 400 Legal Text
- Attachment 2 - Voting Form
- Attachment 3 - DCP 400 Background & Comparisons to DCP 394
- Attachment 4 - DCP 400 Collated Consultation Responses & WG Comments
- Attachment 5 - DCP 400 Change Proposal Form