

DCUSA DCP 400 Change Declaration

Voting end date: 31 October 2022

DCP 400	WEIGHTED VOTING				
	DNO	IDNO	SUPPLIER	CVA REGISTRANT	GAS SUPPLIER
CHANGE SOLUTION	Accept	Accept	Accept	n/a	n/a
IMPLEMENTATION DATE	Accept	Accept	Accept	n/a	n/a
RECOMMENDATION	<p>Change Solution – Accept.</p> <p>In respect of each Party Category that was eligible to vote, the sum of the Weighted Votes of the Groups in that Party Category which voted to accept the change solution was more than 50% in all Categories.</p> <p>Implementation Date – Accept.</p> <p>In respect of each Party Category that was eligible to vote, the sum of the Weighted Votes of the Groups in that Party Category which voted to accept the implementation date was more than 50% in all Categories.</p>				
PART ONE / PART TWO	Part One – Authority Determination Required				

PARTY	SOLUTION (A / R)	IMPLEMENTATION DATE (A / R)	WHICH DCUSA OBJECTIVE(S) IS BETTER FACILITATED?	COMMENTS
DNO PARTIES				
Eastern Power Networks	Accept	Accept	We believe that DCUSA General Objectives 1 and 2 will be better facilitated by this change as there will be increased efficiencies gained from a coordinated approach by not requiring multiple parties where crowded/ shared meter rooms are involved to allow Smart Meter installs to proceed. However, it will be important that the CMRC should communicate with DNOs and identify the Building Network Operator, which would be ideally through a dataflow or some other form of common communication.	None provided.
London Power Networks	Accept	Accept		
South Eastern Power Networks	Accept	Accept		
Northern Powergrid (Northeast) Plc	Accept	Accept	We are in agreement with the Working Group position in that the DCUSA objectives 1 and 2 will be better facilitated by this Change, with the reasons given in the change report.	None provided.
Northern Powergrid (Yorkshire) Plc	Accept	Accept		
Electricity North West Limited	Rejected	Rejected	We understand the purpose of this change but feel that the solution sits outside the scope of the DCUSA, so do not believe any of the DCUSA Objectives will be better facilitated. Our understanding being that such a solution may better facilitate objectives under the Smart Energy Code.	We acknowledge and agree with the principle behind the change; however, we have the following concerns. The intent of this DCP states "Commission necessary works" which differs to the Legal Text Introduction [G], which uses the word 'undertaking' for Crowded Meter Room Works, we feel this has the potential for confusion with the lack of consistency. Consultation questions/comments posed still require clarity. This change does not seem required in addition to DCP 394 if all Alt Han Co are intending is to be a coordinating body as this change directly interacts with DCP 394 and our view at the consultation stages was that DCP 394 and DCP 400 could potentially have been combined. Clause 52W7 "Non-Interference" Gives the CMRC too wide a scope of permission to interfere with DNO equipment. Clear instruction of what is DNO, customer and supplier owned equipment and what permission to work on each should be clarified as it could lead to work going outside of the intended scope with meter moves and service alterations. We also question the word "interfering" being appropriate due to its other meanings within DCUSA. Clause 52x.1 refers to possible illegal

				interference which would require immediate notification to the supplier. We do not feel this is required as the CMRC would be bound by DCUSA rules in relation to this. However, should it be included, theft in conveyance should also be included. Clause 52X.9 – Mandate’s provision of information from DNO to CMRC which we do not accept. Have any data flow requirements been resolved? We feel there is learning to be taken from DCP 383 implementation prior to data flows being established. The Change Report isn’t clear on whether there will be a pilot scheme or not to test the DCP 400 solution.
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IDNO PARTIES				
Energy Assets Networks Limited	Accept	Accept	We are with the Working Group position that DCUSA General Objective 1 and 2 will be better facilitated by the implementation of this change	None provided.

SUPPLIER PARTIES				
OVO Energy	Accept	Accept	DCUSA General Objectives 2 and 4	None provided.
British Gas	Accept	Accept	We agree 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 coordinated 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.	None provided.
SSE Energy Supply Ltd	Accept	Accept	Not provided.	<p>Whilst we agree with this proposal to a certain degree, there are aspects of the change which we do not agree with and need further consideration.</p> <p>52V.3.2 – Add ‘,’ after customer.</p> <p>52W.1 – If is determined that CMRC works are required with the permission of a customer, who determines permission of a CMR should there be several customers impacted? In addition to this determination, who would take responsibility of notifying the customer of these works? And what is the expected timescale for</p>

				<p>these notifications?</p> <p>52W.4 – We do not agree with this clause, should works be completed whereby a de-energisation and reenergisation is required, the supplier and the company should be made fully aware of this prior to the works being completed. This is similar to the concerns which had been raised under DCP394 and should be transferred to this change and legal text.</p> <p>52W.5 – We require additional information as to how these costs will be transferred to industry parties as it is currently not clear</p> <p>52W.6 – Adding to the point made above, should the CMRC notify the supplier and company of a proposal to carry out works at a premises, the supplier and company can notify the CMRC that the property is already de-energised, therefore ensuring that works are not completed.</p> <p>52W.8 – Consent should be granted ahead of works being completed by notification of a data flow to the supplier and company. We believe consent should be expressed, not implied.</p> <p>52X – It is not clear who would be responsible for faults occurred where the CMRC has completed works but the customer has been left without supply, due to the actions taken by the CMRC. This could potentially increase the number of emergency jobs being raised and cause an increase in customer complaints due to the work which has been completed by the CMRC.</p> <p>52X.1 – We agree with clauses 1.1-1.3, we do not agree that a CMRC should not notify a supplier, if they believe they have left the equipment in an interrupted state. The CMRC should notify the supplier in any situation of an interrupted supply, however, referring to the point made above, if the CMRC notifies the supplier or company ahead of such works, the CMRC can be notified of such interruption or current investigation due to suspected theft.</p> <p>It is not clear within the Legal text, who determines that a Crowded Meter Room is required and this process would need to be followed. We note that it is proposed that a Role Code will be defined for the CMRC however we would like to raise the concerns identified within the MHHS programme that available Role Codes</p>
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				<p>are in decline and therefore this should be considered.</p> <p>This DCUSA change and the consequential REC 0043 change should be developed in conjunction with each other, which includes a joint working group. We believe there would be merit in such a working group to ensure that where different parties have concerns, these are discussed and assessed. We do not believe these changes should be assessed in isolation, as we have recently seen with DCP394 and REC0021, where concerns were raised within the DCUSA working group, however as the REC change had already been progressed, concerns in the DCUSA working group were not taken forward and subsequent changes are now required. With a significant amount of industry change required and the current market volatility, code administrators need to ensure that where processes are identified, which need amendments, that these changes are progressed with all parties' concerns included and one change is taken forward to reduce the burden on all impacted parties.</p> <p>We note the REC change is under solution development, but we would like to raise concerns that although the definition of a CMRC has been provided, Data Flows have been included in the REC change which would be used for meter change purposes, this appears to contradict the intent of the DCUSA change.</p>
CVA REGISTRANT PARTIES				
Not Eligible				
GAS SUPPLIER PARTIES				
Not Eligible				