

DCP 419

'Pre-Notification of Planned Supply De-Energisations

COLLATED CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS

Company	Confidential/ Anonymous	1. Do you understand the intent of DCP 419?	Working Group Comments
British Gas	Non-Confidential	Yes we understand the intent of DCP 419.	Noted.
EDF	Non-Confidential	Yes.	Noted.
ENWL	Non-Confidential	Yes.	Noted.
EON	Non-Confidential	Yes we understand the intention of this modification.	Noted.
NPg	Non-Confidential	Yes.	Noted.
Scottish Power [SIP]	Non-Confidential	Yes.	Noted.
Scottish Power [SUPPLIER]	Non-Confidential	Yes.	Noted.
SPEN	Non-Confidential	Yes.	Noted.

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UKPN	Non-Confidential	Yes, we understand the intent of DCP 419 for the pre-notification to Distribution Network Operators (DNOs) for the planned supply de-energisations of smart meters.	Noted.
Utilita	Non-Confidential	Yes.	Noted.
Working Group Conclusions: <ul style="list-style-type: none">- The Working Group noted that all ten participants confirmed that they understand the intent of DCP 419.			

Company	Confidential/ Anonymous	2. Are you supportive of the principles of DCP 419?	Working Group Comments
British Gas	Non-Confidential	<p>Whilst we understand that DNOs have an obligation to contact customers when a Power Outage Alert is received we do not believe that requiring all SIPS and Suppliers to send pre-notification for all de-energisation activity is necessarily the most efficient solution.</p> <p>There will be a cost to both DCUSA Users and SIPS to amend systems to enable pre-notification dataflows to be sent to DNOs and this needs to be compared with the costs of contacting customers unnecessarily.</p> <p>We book many hundreds of thousands of metering jobs each year with customers many of which get cancelled and rebooked. We also attend urgent metering work where it will not be possible to provide advance notice.</p>	<p>It was noted that the pre-notification will be for planned works and not emergency works; however, planned works could turn into emergency works when on site (which DNOs may not be aware of).</p> <p>It was noted that it would be helpful to gain a better understanding of why this change is being proposed and the impact it is currently having on DNOs.</p>

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		We would also be interested to know what percentage of customers are contacted or attempted to be contacted when an outage is POA is received currently.	the Working Group agreed that it would be beneficial to this change for the Secretariat to draft an RFI and circulate to all DNOs to help get a better understanding of the impacts of this change.
EDF	Non-Confidential	<p>No, we are not supportive of this change or the principles behind it. It places a significant administrative burden and cost on suppliers with no clear quantification of the benefits to DNOs. There is also no evidence that the DNOs have considered other ways of addressing the issues noted, for example undertaking analytics to understand where actual power outages that require their intervention may have occurred.</p> <p>It is also worth noting that this will always be an incomplete solution as it will never be possible to pre-notify the DNO of all occasions where a smart meter will be de-energised. Many site visits that require are undertaken at very short notice or might require a de-energisation where that might not have originally been identified as a requirement. For some metering jobs there is also potential for metering point to be de-energised and re-energised multiple times. It is not feasible for the supplier to provide a pre-notification in all these situations. There are likely to be as many de-energisations that can't be pre-notified as there are that can, which calls the value of this change into question.</p> <p>It is not clear what the benefit of this change is for us as supplier, and the DNOs have not quantified the scale of the problem or the cost. As a result, we are not able to support this change.</p>	<p>Same as above, further analysis would be needed to understand the impact of this change on DNOs.</p> <p>Members suggested it may be beneficial to include more information within the change around the various solutions that were discussed and reasons as to why certain solutions were decided to not take forward.</p>

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ENWL	Non-Confidential	Yes.	Noted.
EON	Non-Confidential	<p>Whilst we are supportive of the intention of the modification, we have real concerns regarding how onerous this will become when we move into the realms of mass smart meter replacement with the asset replacement scheme in 2025 and 2G/3G Sunsetting.</p> <p>Surely it is not the intention for the DNO to be swamped with these flows outside of key de-energisation jobs; an exchange for example would be a temporary de-energisation – does this come under the definition of planned works?</p> <p>We think it would be a case of not being able to see the wood for the trees and the scope of this should be narrowed.</p>	<p>Members noted this concern and agreed that this could make this change a lot more complex.</p> <p>Members discussed having a conversation with the DCC directly to ask whether they can confirm the expected process for comms hub decommissions and also ask whether there is a way to filter alerts based on how the alerts are being generated.</p>
NPg	Non-Confidential	Yes.	Noted.
Scottish Power [SIP]	Non-Confidential	Yes.	Noted.
Scottish Power [SUPPLIER]	Non-Confidential	No. As a Supplier we would like to understand the degree of this issue that has resulted in the obligation to inform the DNO has to be on the supplier. Is this required for all individual smart to smart meter exchanges? Would there be a certain level of penetration of POAs in locations before the DNO had to instigated internal processes or would they for all POA instances?	It was noted that an obligation can be put on a Supplier, but not directly on MEMs as this would have a direct interaction with REC.

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		<p>Has analysis of volumes been provided at the workgroups and can this be shared? Is the volume of instances distributed across all supplier meter points or are there more impacting than others?</p> <p>As this change is to ensure that all DCUSA parties provide the advance notification should this also not be expected of the Suppliers appointed MEM?</p>	
SPEN	Non-Confidential	Yes.	Noted.
UKPN	Non-Confidential	We are supportive of the principles of DCP 419 so that a DNO is provided with prior notification of any planned supply de-energisation by DCUSA parties. Prior notification of planned supply interruptions will enable DNOs to ignore POAs received from those smart meters, meaning that DNOs avoid unnecessarily contacting customers where prior notification has been received. This will help ensure good customer service and avoid unnecessary costs being passed on to consumers via DUoS bills.	Noted.
Utilita	Non-Confidential	Yes.	Noted.
<p>Working Group Conclusions:</p> <ul style="list-style-type: none">- The Working Group noted that six participants confirmed that they support the principles of DCP 419.- Two participants confirmed they support the intent of DCP 419 but have some concerns around the proposed solution.			

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- Two participants confirmed they do not support the principles of DCP 419.

Company	Confidential/ Anonymous	3. Do you agree with the Working Group's view that Revenue Protection Agents should be excluded from this CP? If not, please provide your rationale.	Working Group Comments
British Gas	Non-Confidential	We agree that Revenue Protection Agents should be excluded from this CP.	Noted.
EDF	Non-Confidential	No. We note that the rationale for excluding them is that they may not know if they need to de-energise or not until they arrive on site to review the scenario. That logic applies to a significant proportion of site visits undertaken by other parties (including suppliers) as well, in which case the information being sent by Revenue Protection Agents is likely to be as accurate (or inaccurate) as that sent by any other party.	Noted.
ENWL	Non-Confidential	Yes, as the work of the Revenue Protection Agent is unplanned in nature.	Noted.
EON	Non-Confidential	We have no issue with this.	Noted.
NPg	Non-Confidential	No. The draft legal text puts the obligation to give notice of supply de-energisation on the User. A Supplier is "the User" and the Revenue	Noted.

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		<p>Protection Agent is either part of the Supplier or a third party that acts on the Supplier's behalf under contract to the Supplier. Consequently, a Supplier (i.e. the User) has the obligation to notify the DNO (via the Supplier's RP agent) of planned potential supply de-energisations. Therefore, we do not agree that RP agents should be excluded from this CP.</p> <p>Theft of electricity priority 2 and 3 jobs are expected to be visited by RP agents within 20 and 30 working days respectively so will be planned work. Therefore, notification of these visits, where a smart meter is installed, will be required. Though many priority 2 and 3 visits may not result in a de-energisation, for the ones that do, the DNO would have visibility of these visits via the notification Market Message so the DNO can exclude them from their obligation in the RIGs to contact the customer. Priority 1 jobs are expected to be visited by RP agents within the same day so a minimum of 1 days' notice will not be possible.</p> <p>Therefore, if the intention and outcome of this CP is for the DNO to receive notification of potential de-energisations the day before the event, notification of priority 1 calls can, therefore, be excluded from the RIGS obligation (to contact the customer) by the DNO.</p>	
Scottish Power [SIP]	Non-Confidential	As some Revenue Protection work can be pre-planned could they also provide prenotification for these instances?	Noted.
Scottish Power [SUPPLIER]	Non-Confidential	As some Revenue Protection work can be pre-planned could they also provide prenotification for these instances?	Noted.

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SPEN	Non-Confidential	Whilst we agree with the Working Group's view that Revenue Protection Agents should be excluded from this CP, we suggest that where the Revenue Protection Agent leaves the customer off supply by withdrawing the main fuse, an immediate notification of that action is provided by the Revenue Protection Agent. There is no requirement to provide the reasons for withdrawing the supply. This notification will allow DNOs to deal effectively with any subsequent customer enquiry. We consider "immediate" to mean whilst the Revenue Protection Agent is on site. As such, this would not be via another Market Message (or change to an existing Market Message). The suggestion would be for notification by telephone, similar to the process to report Category-A defects with DNO equipment.	<p>The Working Group noted that this is already within the DCUSA under DCP 394, where they would need to notify the Supplier where the site was unable to be energised the same day.</p> <p>It was suggested that there may also need to be a REC change to accommodate the MEMs being able to send the data flows – the Secretariat agreed to contact REC for further guidance around this.</p>
UKPN	Non-Confidential	We agree with the Working Groups view that Revenue Protection Agents should be excluded from the CP because of the nature of their work, where they may not know until arriving on site whether they need to de-energise the supply. However, the commitment to report should remain if a facility to report is available. We are considering a real time facility within our online Defect Reporting tool.	Noted.
Utilita	Non-Confidential	Yes, due to the nature of the work it is difficult to determine what actions will be required until on site; hence revenue protection work shouldn't be considered under these proposed changes.	Noted.
<p>Working Group Conclusions:</p> <ul style="list-style-type: none"> - The Working Group noted that five participants confirmed that they agree that Revenue Protection Agents should be excluded from this CP. 			

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- Two participants did not confirm whether they agree or disagree that Revenue Protection Agents should be excluded from this CP.
- One participant confirmed that although they agree that Revenue Protection Agents should be excluded from this CP, they suggest that where the Revenue Protection Agent leaves the Customer off supply by withdrawing the main fuse, an immediate notification of that action is provided by the Revenue Protection Agent.
- Two participants confirmed they do not agree that Revenue Protection Agents should be excluded from this CP.
- The overall consensus of responses suggests that there is not enough information to de-scope RPAs from this change, and therefore suggest they should remain included.
- The Working Group suggested that there may also need to be a REC change to accommodate the MEMs being able to send the data flows.

Company	Confidential/ Anonymous	4. Do you agree with the Working Group's view that, with the exception of SIP work, pre-notification of de-energising a whole current metering point should only be required where there is a smart meter installed? If not, please provide your rationale.	Working Group Comments
British Gas	Non-Confidential	Yes we agree that if pre-notification is required these should only be sent for smart meters.	Noted.
EDF	Non-Confidential	Yes. The stated logic behind this change relates to alerts sent by smart meters, logically there is no value in sending a notification to DNOs where there is no smart meter on site.	Noted.
ENWL	Non-Confidential	Yes, we agree with this approach.	Noted.

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EON	Non-Confidential	Yes, we agree.	Noted.
NPg	Non-Confidential	Yes.	Noted.
Scottish Power [SIP]	Non-Confidential	Yes.	Noted.
Scottish Power [SUPPLIER]	Non-Confidential	No. Please see response to Q2.	The Working Group noted the concerns outlined in Q2.
SPEN	Non-Confidential	Yes, smart meters only.	Noted.
UKPN	Non-Confidential	We agree with the Working Groups view that, with the exception of SIP work, pre-notification of de-energising whole-current metering points should be required only where there is a smart meter installed.	Noted.
Utilita	Non-Confidential	Yes, as distributors only receive power outage alerts from smart meters, so if there isn't one already installed there is no benefit in the distributor receiving a notification.	Noted.
Working Group Conclusions: <ul style="list-style-type: none">- The Working Group noted that nine participants confirmed that they agree that with the exception of SIP work, pre-notification of de-energising a whole current metering point should only be required where there is a smart meter installed.			

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- One participant confirmed that they do not agree that with the exception of SIP work, pre-notification of de-energising a whole current metering point should only be required where there is a smart meter installed.

Company	Confidential/ Anonymous	5. Do you agree that this new Market Message should be utilised for SIP Parties to provide pre-notification of all Safe Isolation Works in order to fulfil the requirements of DCP 394 as well as DCP 419, if this CP is approved?	Working Group Comments
British Gas	Non-Confidential	No we believe the D0396 should be amended to allow it to be sent to the DNO as well as Supplier. This will provide a much more robust audit trail of work completed than relying on the original appointment booking which may not go ahead.	Members agreed that sending the flow to the DNO as well as the Supplier would resolve the audit trail issue. The pre-notification could also be used to resolve the customer service issue. It was agreed to include this suggestion within the RFI to seek further feedback.
EDF	Non-Confidential	No. The new market message would be very costly for us to implement and not something that could be done easily. Other ways of informing the DNO of SIP work should be explored that would not cost SIPs extra money or resource.	Noted.
ENWL	Non-Confidential	Yes, this would be an efficient way for SIP Parties to fulfil their obligations.	Noted.

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EON	Non-Confidential	Yes, we agree that a new market message should be utilised.	Noted.
NPg	Non-Confidential	Yes.	Noted.
Scottish Power [SIP]	Non-Confidential	Yes.	Noted.
Scottish Power [SUPPLIER]	Non-Confidential	Yes.	Noted.
SPEN	Non-Confidential	Yes.	Noted.
UKPN	Non-Confidential	We agree that this new Market Message should be utilised for SIP parties to provide pre-notification of all safe isolation work where there is a smart meter installed.	Noted.
Utilita	Non-Confidential	Yes.	Noted.
Working Group Conclusions: <ul style="list-style-type: none">- The Working Group noted that eight participants confirmed that they agree that this new Market Message should be utilised for SIP Parties to provide pre-notification of all Safe Isolation Works in order to fulfil the requirements of DCP 394 as well as DCP 419, if this CP is approved.- Two participants confirmed that they <u>do not</u> agree that this new Market Message should be utilised for SIP Parties to provide pre-notification of all Safe Isolation Works in order to fulfil the requirements of DCP 394 as well as DCP 419, if this CP is approved.			

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- Members agreed that sending the flow to the DNO as well as the Supplier would resolve the audit trail issue. The pre-notification could also be used to resolve the customer service issue. This suggestion will be included within an RFI to seek further feedback from DNOs.

Company	Confidential/ Anonymous	6. Do you agree with the Working Group view that the use of an existing Market Message is not appropriate to facilitate the DCP 419 solution? If not, do you believe that the D0368 or any other Market Message could be utilised? Please provide the rationale for your answer.	Working Group Comments
British Gas	Non-Confidential	We believe the D0368 could be used as it may be more efficient for an existing flow to be used rather than creating a brand-new flow.	Members noted that if this flow is not valued by Suppliers, this could be used – although reintroducing the D0368 flow may be of similar cost to creating a new flow.
EDF	Non-Confidential	Yes, there are no existing market messages that would support DCP419.	Noted.
ENWL	Non-Confidential	There was also a suggestion that the D0164 could be utilised, but we do believe that having a new Market Message for this process would be a more appropriate solution as it provides a clear instruction. If an existing Market Message were to be amended there could potentially be confusion as to its use.	Noted.
EON	Non-Confidential	Yes, we agree that it is not appropriate to re-use an existing flow.	Noted.

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NPg	Non-Confidential	Yes.	Noted.
Scottish Power [SIP]	Non-Confidential	Yes.	Noted.
Scottish Power [SUPPLIER]	Non-Confidential	Yes.	Noted.
SPEN	Non-Confidential	Yes. Neither the existing D0368, nor any other existing message, could be used in its' current structure for the intended purpose of the DCP 419 solution. Any Market Message received would have to include the de-energisation indicator. So, either an existing Market Message would have to be amended, or a new Market Message would be required.	Noted.
UKPN	Non-Confidential	We agree with the Working Group view that the use of an existing Market Message is not appropriate to facilitate the DCP 419 solution because repurposing an existing Market Message could disrupt its existing function and cause unintended consequences to parties using the flow as it is now.	Noted.
Utilita	Non-Confidential	Yes, using a new market message will ensure that only required info is present for its intended purpose and avoid any confusion.	Noted.
Working Group Conclusions: <ul style="list-style-type: none">- The Working Group noted that nine participants confirmed that they agree that this new Market Message should be utilised for SIP Parties to provide pre-notification of all Safe Isolation Works in order to fulfil the requirements of DCP 394 as well as DCP 419, if this CP is approved.			

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- One participant confirmed that they do not agree that this new Market Message should be utilised for SIP Parties to provide pre-notification of all Safe Isolation Works in order to fulfil the requirements of DCP 394 as well as DCP 419, if this CP is approved.
- Overall, the majority of respondents believe it would be more appropriate to create a brand-new flow. The Working Group's view is to support the majority view.

Company	Confidential/ Anonymous	<p>7. Do you believe that the current version of the DCP 419 Market Message specification is sufficient to deliver the proposed solution? If not, please provide details of any proposed amendments needed (i.e. are there any additional data items needed or items detailed not needed. Please provide your rationale).</p> <p>Note: The DCP 419 Market Message specification has been provided as a word document so that respondents can provide any suggestions with tracked changes.</p>	Working Group Comments
British Gas	Non-Confidential	<p>Should the flow be directed to the Supply Fault Information Centre (SFIC)?</p> <p>De-energisation appointment booking is also carried out by metering agents directly as well as Suppliers. We think the new flow should also be sent from the MEM.</p> <p>What value is there is sending the Appointment Type – this is initial or re-booking.</p>	<p>Members discussed whether the SFIC and Distributor are one in the same – it was agreed for the Secretariat to contact REC and confirm this and confirm this to ensure that all DNOs/IDNOs will receive the flows.</p> <p>The Working Group stated that the Appointment Type is already a defined data item and is for information only.</p>

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			After further discussion, the Working Group came to an agreement that Appointment Type does not need to be included.
EDF	Non-Confidential	<p>No. The market message only covers a small proportion of site visits that are undertaken as it covers those site visits which are agreed with the customer in advance, which would not include emergency visits undertaken at very short notice. It would also only be sent where a de-energisation is expected, whereas there are numerous occasions where a meter might need to be de-energised on an unplanned basis.</p> <p>Additionally, the new market message will inform the DNOs of the work that is due to be completed but there is no timeframe on it; therefore, if a meter appointment happens in the morning but a genuine meter fault occurs in the afternoon will the DNOs still assume this is related to the de-energisation based on the first market message sent? What happens if a supplier is on site for 2 days repairing a meter fault, would this mean 2 market messages would need to be sent? We are not always aware of the customer cancellation of an appointment until the agreed date and time, would this be too late for this information to be sent to the DNOs?</p> <p>There are so many exceptions to the rule that we would question the value of sending the market message, and of this change overall.</p>	The Working Group agreed that further analysis would help in this instance, and it was noted that the RFI that will be circulated will aim to gather additional information that will help to support this change.

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ENWL	Non-Confidential	<p>Yes, the new Market Message specification seems appropriate to deliver the intent of this change proposal. Would the new Market Message be a DTN or DIP flow?</p> <p>Has the working group considered whether the DCC could implement filtering the POAs based on Market Messages in advance?</p> <table><tr><td>Flow Description:</td><td><p>This data flow is to be utilised to ensure that all relevant parties <u>are informed of upcoming work</u>, that de-energises a whole current metering point with a smart meter installed. It, as part of any planned work, provides the Distributor with advance notification of the supply interruption.</p><p>Note: Safe Isolation Providers (SIP) Parties should utilise this flow to provide pre-notification of all Safe Isolation Works.</p></td></tr><tr><td>Notes:</td><td><p>This data flow is to be utilised to ensure that all relevant parties are informed of upcoming work that de-energises a whole current metering point with a smart meter installed. It provides the Distributor with advance notification of the supply interruption.</p><p>This data flow is to be utilised to ensure that all relevant parties, that de-energises a whole current metering point with a smart meter installed, as part of any planned work, provide the Distributor with advance notification of the supply interruption.</p><p>Note: Safe Isolation Providers (SIP) Parties should utilise this flow to provide pre-notification of all Safe Isolation Works.</p></td></tr></table>	Flow Description:	<p>This data flow is to be utilised to ensure that all relevant parties <u>are informed of upcoming work</u>, that de-energises a whole current metering point with a smart meter installed. It, as part of any planned work, provides the Distributor with advance notification of the supply interruption.</p> <p>Note: Safe Isolation Providers (SIP) Parties should utilise this flow to provide pre-notification of all Safe Isolation Works.</p>	Notes:	<p>This data flow is to be utilised to ensure that all relevant parties are informed of upcoming work that de-energises a whole current metering point with a smart meter installed. It provides the Distributor with advance notification of the supply interruption.</p> <p>This data flow is to be utilised to ensure that all relevant parties, that de-energises a whole current metering point with a smart meter installed, as part of any planned work, provide the Distributor with advance notification of the supply interruption.</p> <p>Note: Safe Isolation Providers (SIP) Parties should utilise this flow to provide pre-notification of all Safe Isolation Works.</p>	<p>It was confirmed that the new Market Message specification would be a DTN flow.</p> <p>The Working Group noted that there may be potential interactions with the DIP moving forward.</p>
Flow Description:	<p>This data flow is to be utilised to ensure that all relevant parties <u>are informed of upcoming work</u>, that de-energises a whole current metering point with a smart meter installed. It, as part of any planned work, provides the Distributor with advance notification of the supply interruption.</p> <p>Note: Safe Isolation Providers (SIP) Parties should utilise this flow to provide pre-notification of all Safe Isolation Works.</p>						
Notes:	<p>This data flow is to be utilised to ensure that all relevant parties are informed of upcoming work that de-energises a whole current metering point with a smart meter installed. It provides the Distributor with advance notification of the supply interruption.</p> <p>This data flow is to be utilised to ensure that all relevant parties, that de-energises a whole current metering point with a smart meter installed, as part of any planned work, provide the Distributor with advance notification of the supply interruption.</p> <p>Note: Safe Isolation Providers (SIP) Parties should utilise this flow to provide pre-notification of all Safe Isolation Works.</p>						
EON	Non-Confidential	No comment.	Noted.				
NPg	Non-Confidential	Yes.	Noted.				

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Scottish Power [SIP]	Non-Confidential	<p>Yes. We do have some points regarding the J2053 (Customer Cancelled Appointment) data item that we have detailed below:</p> <p>The new Market Message is a pre-notification prior to the day of the site visit. What is the process in the event of the customer subsequently cancelling the appointment before or on the day of the site visit? Should the new Market Message be issued to confirm that the SIP did not attend site? This would help mitigate any liabilities should there be a POA event / site issue, at a later date.</p> <p>Similar to the above, should the new Market Message also be sent where the SIP has not been able to access the site due to the scenario of a No Access by the customer? And if the work was not progressed due to an issue on site that the SIP had to inform the Supplier to resolve prior to rescheduling a new date to return to carry out the SIP work?</p> <p>How are the PRAs monitored and what is the escalation point if they are not issued?</p>	<p>The Working Group noted that distributors would not necessarily expect a cancellation, however members understand why a cancellation flow would be preferred to ensure the last person to visit a site is more accurate.</p> <p>In regard to a POA not being issued, the Working Group stated that if this change is approved, it will be a licence condition under DCUSA. If the POA is not sent, they would be failing to meet their licence condition.</p>
Scottish Power [SUPPLIER]	Non-Confidential	<p>Yes. We do have some points regarding the J2053 (Customer Cancelled Appointment) data item that we have detailed below:</p> <p>The new Market Message is a pre-notification prior to the day of the site visit. What is the process in the event of the customer subsequently cancelling the appointment before or on the day of the site visit? Should the new Market Message be issued to confirm that the SIP did not attend site?</p>	<p>The Working Group noted the same as above.</p>

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		<p>This would help mitigate any liabilities should there be a POA event / site issue, at a later date.</p> <p>Similar to the above, should the new Market Message also be sent where the SIP has not been able to access the site due to the scenario of a No Access by the customer? And if the work was not progressed due to an issue on site that the SIP had to inform the Supplier to resolve prior to rescheduling a new date to return to carry out the SIP work?</p> <p>How are the PRAs monitored and what is the escalation point if they are not issued?</p>	
SPEN	Non-Confidential	Yes.	Noted.
UKPN	Non-Confidential	<p>The new Market Message template shown as attachment 3 in the DCP 419 consultation document is believed to be sufficient to deliver the proposed solution, however this should be reviewed as changes may be required once an appropriate solution is developed.</p> <p>In addition, there should be a solution for non-DCUSA parties who do not use market messaging to notify DNOs of a pre-planned supply interruption.</p>	The Working Group agreed that the MEM should be able to send pre-notifications to the DNO. If this is added, a REC change is likely to be needed.
Utilita	Non-Confidential	Yes, it appears to provide adequate information for its intended use.	Noted.
Working Group Conclusions:			

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- The Working Group noted that seven participants believe that the current version of the DCP 419 Market Message specification is sufficient to deliver the proposed solution.
- One participant did not provide any comments, and two participants do not believe that the current version of the DCP 419 Market Message specification is sufficient to deliver the proposed solution.
- One participant raised concerns around the value of the new market message - the Working Group agreed that further analysis would help in this instance, and it was noted that the RFI that will be circulated will aim to gather additional information that will help to support this change.
- The Working Group confirmed that the new Market Message specification will be a DTN flow, however, it was noted that there may be potential interactions with the DIP moving forward.
- The Working Group agreed that the MEM should be able to send pre-notifications to the DNO. If this is added, a REC change is likely to be needed.

Company	Confidential/ Anonymous	8. 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
British Gas	Non-Confidential	We do not believe the case has been made to justify that the solution is proportionate to the issue being addressed.	
EDF	Non-Confidential	No. The reason for this change is purely to ensure that DNOs do not have to manually follow up on all power outage alerts, however as noted in the	

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		consultation document there is no expectation from Ofgem or suppliers that they will do so. It is not clear that the DNOs have considered any simpler, more cost effective solutions, instead choosing the place the burden on suppliers with no clear quantification of the benefits of doing so. As a result, we do not believe this change should be progressed.	
ENWL	Non-Confidential	We agree with the reasoning in the consultation document that this change will better facilitate General Objectives 1, 3 and 4.	
EON	Non-Confidential	We would dispute that being provided with advanced notification of all and any planned works is particularly efficient in line with objective 4; the volume of them will be too high to be meaningful in our opinion.	
NPg	Non-Confidential	Yes.	
Scottish Power [SIP]	Non-Confidential	Yes.	
Scottish Power [SUPPLIER]	Non-Confidential	Yes for SIP.	
SPEN	Non-Confidential	Yes. Objective 1 is impacted positively through the co-ordination of the DNO's distribution network. Objective 3 is impacted positively through the enhanced knowledge of activities affecting the DNO's distribution network. Objective 4 is impacted positively through the avoidance of unnecessary (and therefore inefficient) processes.	

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UKPN	Non-Confidential	We agree that this proposal better facilitates the DCUSA general objectives and in particular, objectives 1, 3 and 4.	
Utilita	Non-Confidential	<p>Yes, we believe that general objectives 1 and 4 will be better facilitated.</p> <p>The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks. By providing notification of planned works the distributors can be more efficient with their time rather than dedicating resources to investigating any power outage alerts.</p> <p>The promotion of efficiency in the implementation and administration of the DCUSA.</p> <p>It will ensure SIP parties meet the requirement of pre-notification of all safe isolation works.</p>	
Working Group Conclusions:			

Company	Confidential/ Anonymous	9. Are you aware of any wider industry developments that may impact upon or be impacted by this CP?	Working Group Comments
British Gas	Non-Confidential	No.	

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EDF	Non-Confidential	No.	
ENWL	Non-Confidential	Is there interaction with the Data Integration Platform?	
EON	Non-Confidential	Asset replacement scheme in 2025 and 2G/3G Sunsetting.	
NPg	Non-Confidential	No.	
Scottish Power [SIP]	Non-Confidential	No.	
Scottish Power [SUPPLIER]	Non-Confidential	No.	
SPEN	Non-Confidential	No.	
UKPN	Non-Confidential	DCP 394 Provision of Isolations for Safe Working on Customers' Electrical Installations is similar to the requirements of this DCP 419.	
Utilita	Non-Confidential	No.	
Working Group Conclusions:			

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Company	Confidential/ Anonymous	10. Do you agree with the Working Groups proposed implementation date? If not, please provide your rationale.	Working Group Comments
British Gas	Non-Confidential	We believe the implementation date should be the next standard release date which is at least 6 months following Authority approval.	
EDF	Non-Confidential	Yes.	
ENWL	Non-Confidential	Yes, as this change will introduce a new Market Message, we believe there should be a minimum of 6 months before implementation following Authority approval.	
EON	Non-Confidential	No November does not give us enough time to implement the required system changes to be able to send a flow in all of the circumstances it is required.	
NPg	Non-Confidential	Yes.	
Scottish Power [SIP]	Non-Confidential	Yes.	

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Scottish Power [SUPPLIER]	Non-Confidential	No. We would not be able to confirm that 6 months would be enough time to develop and implement an IT solution until a full impact assessment has been conducted.	
SPEN	Non-Confidential	Yes.	
UKPN	Non-Confidential	We agree with the Working Groups proposal for the next DCUSA release to be implemented no sooner than six months after Authority approval date.	
Utilita	Non-Confidential	Yes.	
Working Group Conclusions:			

Company	Confidential/ Anonymous	11. Do you have any comments on the proposed legal text?	Working Group Comments
British Gas	Non-Confidential	30.19 Where the User plans to de-energise a whole current metering point, with a smart meter installed, the User or their agent shall give the Company at least one (1) Working Day's advance notification. This notice should be sent using the appropriate Market Message as defined in the Energy Market Data Specification.	

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		52Z.7 The Safe Isolation Provider shall give the Company at least one (1) Working Day's advance notification of the day on which the Safe Isolation Provider is to undertake Safe Isolation Works at a premises where whole current metering, with a smart meter is installed. This notice should be sent using the appropriate Market Message as defined in the Energy Market Data Specification.	
EDF	Non-Confidential	No.	
ENWL	Non-Confidential	We believe the legal text will deliver the intent of DCP 419.	
EON	Non-Confidential	We believe that planned works should be a defined term in the legal text so it is absolutely clear which works this requirement extends to.	
NPg	Non-Confidential	Yes. If the proposal to include theft of electricity priority 2 and 3 calls is included in this CP, the legal text of 30.19 may need to reflect that the RP agent may not necessarily be "planning" to de-energise – but may do so.	
Scottish Power [SIP]	Non-Confidential	No.	
Scottish Power [SUPPLIER]	Non-Confidential	No.	
SPEN	Non-Confidential	No.	

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UKPN	Non-Confidential	The proposed legal text explains the new requirements for pre-notification of planned supply de-energisation, however this should be reviewed once an appropriate solution has been developed, as this may require changes to the legal text.	
Utilita	Non-Confidential	No.	
Working Group Conclusions:			

Company	Confidential/Anonymous	12. Do you have any other comments on DCP 419?	Working Group Comments
British Gas	Non-Confidential	No comment.	
EDF	Non-Confidential	As previously noted, we do not support of this change and do not agree that it should be implemented.	
ENWL	Non-Confidential	As this change will assist a Distributor in only contacting customers that have a genuine unplanned interruption it will provide efficiencies and improve the customer journey.	
EON	Non-Confidential	No comment.	

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NPg	Non-Confidential	No.	
Scottish Power [SIP]	Non-Confidential	No.	
Scottish Power [SUPPLIER]	Non-Confidential	No.	
SPEN	Non-Confidential	No.	
UKPN	Non-Confidential	No.	
Utilita	Non-Confidential	No.	
Working Group Conclusions:			