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Modification proposal:	**Distribution Connection and Use of System Agreement (DCUSA) Change Proposal (CP) DCP400 – Commissioning of Works using shared Meter Operator services by the Crowded Meter Room Coordinator**		
Decision:	The Authority[1] directs that this modification be made[2]		
Target audience:	DCUSA Panel, Parties to the DCUSA and other interested parties		
Date of publication:	2 December 2022	Implementation date:	12 December 2022

Background

A smart metering installation in domestic premises includes gas and electricity smart meters, an in-home Display (IHD) and a communications hub (CH). Within the customer's premises, these devices communicate with each other via a Home Area Network (HAN). However, in some premises there is a HAN coverage gap. When a gap is identified, additional equipment is required to extend the range of the HAN to connect all smart metering devices to the domestic customer's premises.

Alt HAN Company Ltd (Alt HAN Co) was established to allow Suppliers[3] to meet their obligations in licence and under Smart Energy Code (SEC) Section Z to resolve the HAN coverage gap.[4] The solution developed by Alt HAN Co utilises Alt HAN bridges, which is a technology used to extend the signal range between smart meters and devices within a domestic customer's premises, to establish the HAN. One of these bridges must be wired at the electricity meter and therefore adequate space is required around the meter to install the bridge.

[1] References to the "Authority", "Ofgem", "we" and "our" are used interchangeably in this document. The Authority refers to GEMA, the Gas and Electricity Markets Authority. The Office of Gas and Electricity Markets (Ofgem) supports GEMA in its day to day work. This decision is made by or on behalf of GEMA.
[2] This document is notice of the reasons for this decision as required by section 49A of the Electricity Act 1989.
[3] 'Suppliers' is defined in DCUSA Section 1.1 Definitions and Interpretation
[4] Smart Energy Code Section Z – Alt HAN Arrangements

There are times where the installation of smart metering equipment can be challenging due to factors such as space constraints. This is particularly prevalent in meter rooms within multiple dwelling units (MDUs) which contain a co-location of Metering Points.[5] These are known as Crowded Meter Rooms (CMRs). In some buildings, such as MDUs, the HAN cannot extend from the smart metering equipment to the customer's premises. In this instance, a Supplier may utilise the Alt HAN solution, outlined above; however, sufficient space is required within the meter room to install the equipment. In CMRs this can be challenging as there is currently no process for resolving CMR related spatial constraint issues without involving multiple resolving parties which is an obstacle to Suppliers fully and efficiently deploying solutions to establish the HAN for Alt HAN candidates.

The modification proposal

DCP400 was raised by Shell Energy Retail Limited (the "Proposer") on 21 January 2022. The intent of the modification is to allow Alt HAN Co, acting as a Crowded Meter Room Coordinator (CMRC) to commission the necessary works, using a shared Meter Operator[6], to resolve meter room issues that enables the installation of smart metering and Alt HAN equipment. The Proposer believes that the modification would better facilitate DCUSA Objectives 1, 2 and 3.

This change proposal would allow Alt HAN Co, as the CMRC, to investigate and resolve issues in CMRs on behalf of resolving parties which would facilitate the installation of smart metering and Alt HAN equipment. In a CMR, the installation of smart metering equipment may be inhibited by the close collocation of meters, the proximity of trunking, cut-outs, distribution equipment, risers, customer equipment and other building infrastructure. These constraints sit across multiple jurisdictions of accountability. To resolve CMR issues, the CMRC would require permission, resolution dependent, from resolving parties including:

- Distributors when work is required on distribution network assets
- Suppliers when meters need to be relocated or moved
- Meter Asset Providers who make meters available to Suppliers
- Building owners and Building Network Operators (BNOs)

[5] 'Metering Point' is defined in DCUSA Section 1.1 Definitions and Interpretation
[6] 'Meter Operator' is defined in DCUSA Section 1.1 Definitions and Interpretations

DCP400 would permit the CMRC to enable the co-ordination of actions across multiple jurisdictions and resolving parties which would minimise aborted installations and associated costs and allow for a more cost-effective use of industry resources and a less disruptive experience for customers.

The modification provides the necessary permissions to allow Alt HAN Co, acting as the CMRC, to be permitted by DCUSA Parties to commission works to resolve CMRs via a Retail Energy Code (REC) accredited Meter Equipment Manager (MEM). This work includes the de-energising of an entry/exit point; repositioning meters, cabling, local points of isolation and customer isolation switches; removing and disposing of inhibitive trunking and cable trays; removing and disposing of redundant equipment; and/or re-energising an entry/exit point. DCP400 states that any work required outside of the above requires further approval from the relevant resolving party.

The full legal text is included within the Final Change Report as Attachment 1.

DCUSA Parties' recommendation

In each party category where votes were cast (no votes were cast in the CVA Registrant party category or Gas Supplier categories),[7] there was majority (>50%) support for the proposal and for its proposed implementation date. In accordance with the weighted vote procedure, the recommendation to the Authority is that DCP400 is accepted. The outcome of the weighted vote is set out in the table below:

DCP400	WEIGHTED VOTING (%)									
	DNO[8]		IDNO[9]		SUPPLIER		CVA[10] REGISTRANT		GAS SUPPLIER	
	Accept	Reject	Accept	Reject	Accept	Reject	Accept	Reject	Accept	Reject
CHANGE SOLUTION	83%	17%	100%	0%	100%	0%	n/a	n/a	n/a	n/a
IMPLEMENTATION DATE	83%	17%	100%	0%	100%	0%	n/a	n/a	n/a	n/a

[7] There are currently no gas supplier parties.
[8] Distribution Network Operator
[9] Independent Distribution Network Operator/Offshore Transmission System Operator
[10] Central Volume Allocation

Our decision

We have considered the issues raised by the proposal and the Change Declaration and Change Report dated 10 October 2022. We have considered and taken into account the vote of the DCUSA Parties on the proposal which is attached to the Change Declaration. We have concluded that:

- implementation of the modification proposal will better facilitate the achievement of the Applicable DCUSA General Objectives 1, 2 and 3;[11] and

- directing that the modification is approved is consistent with our principal objective and statutory duties.[12]

Reasons for our decision

We consider this change proposal will better facilitate DCUSA General Objectives 1, 2 and 3 and has a neutral impact on the other applicable objectives.

Applicable DCUSA Objective (1) - the development, maintenance and operation by the licensee of an efficient, co-ordinated, and economical Distribution System

We note concern outlined in one of the responses to the DCP400 consultation that the change proposal only addresses part of what is required to facilitate the full operational capability of a CMRC. It was explained that in their view, the change proposal does not completely address issues related to data sharing and other contractual arrangements. However, we agree with the DCUSA Panel and Working Group that DCP400 should be viewed and accepted as an enabler for the CMR solution rather than mandating the coordination, as other processes will be in place in support of the solution. This proposal allows the CMRC to commission necessary works, using a shared MEM who will engage with all relevant parties before any CMR works take place. DCP400 notes that any work required outside of the definition of CMR works will require further permission from the relevant party.

We believe that this change proposal better facilitates DCUSA Objective 1 as the provision of the CMRC will enable more customers to access the benefits of the smart

[11] The Applicable DCUSA Objectives are set out in Standard Licence Condition 22.2 of the Electricity Distribution Licence.
[12] The Authority's statutory duties are wider than matters that the Parties must take into consideration and are detailed mainly in the Electricity Act 1989 as amended.

meter rollout. The current situation means that smart meter installations to premises is cumbersome where CMRs are not able to proceed without the intervention of multiple resolving parties sitting across various jurisdictions. The CMRC, as proposed in DCP400, will be able to navigate these jurisdictions and resolve related issues. This will increase the number of smart meter installations for Suppliers, particularly in MDUs, therefore allowing Suppliers to meet their smart meter rollout obligations efficiently which are underpinned in the licence conditions.

Applicable DCUSA Objective (2)– the facilitation of effective competition in the generation and supply of electricity and (so far as is consistent with that) the promotion of such competition in the sale, distribution and purchase of electricity

DCUSA Objective 2 is better facilitated by the proposal as the CMRC will allow more customers to access the benefits of smart metering, by resolving CMR issues which currently inhibit customers from accessing the full range of smart meter benefits on offer including tariffs. This would have a positive impact on DCUSA Objective 2 as it would remove barriers to entry in terms of administrative costs to resolve installation complications caused by CMRs. Therefore, improving the facilitation of effective competition in the generation and supply of electricity and the promotion of such competition in the sale, distribution, and purchase of electricity.

Applicable DCUSA Objective (3) - the efficient discharge by the licensee of the obligations imposed upon it by its licence

We believe that DCP400 will have a positive impact on Objective 3 as it will allow for Suppliers to ensure that customers are able to access smart metering by providing a coordinated solution to challenges posed by engaging with resolving parties across multiple jurisdictions. This will allow Suppliers to efficiently meet the obligations imposed on them by their licence.

Furthermore, DCP400 will have a positive impact on DCUSA Objective 3 as the introduction of a CMRC will result in a reduced amount of aborted and cancelled installations and limit the impact of the associated financial costs of these abortions and cancellations on both Suppliers and the customer.

Decision notice

In accordance with standard licence condition 22.14 of the Electricity Distribution Licence, the Authority hereby directs that modification proposal DCP400: *Commissioning of Works using shared Meter Operator services by the Crowded Meter Room Coordinator* be made.

Michael Walls
Head of Retail Market Operations
Signed on behalf of the Authority and authorised for that purpose