| No | QUESTION | RESPONDENT | RESPONSE |
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| 1 | Do you have any comments on the Proposed Solution? | GazProm | How will a party be able to identify if the relevant Metering Equipment Manager (MEM) is able to undertake the activity of a Safe Isolation Provider (SIP) e.g., that they have acceded to DCUSA<br>I note the justification provided is largely in the context of domestic work i.e., homeowners. In this context should the scope of this solution be so limited?<br>As far as I am aware a MEM is not a licenced party so who is liable if something goes wrong? Accordingly if the MEM causes third party damage how will claims be managed?<br>Does this increase the risk to the Suppliers Licence compliance or does the MEM being granted this authorisation to undertake work without the Supplier consent carve out any associated risk i.e., the Supplier shall not be liable for any consequences arising?<br>Could this be miss used to re enable sites that have been disconnected for debt/safety? If so, what protections are in place?<br>Is it appropriate that the work can be authorised by a homeowner or landlord and if so, how is it determined that they are authorised i.e. not a tenant? Note: in the Summary it refers to premise owners and occupiers but further on it refers to the homeowner and landlord<br>Is it explicitly clear in the required interaction between the MEM and the relevant party asking for the work that the tenant's consent is required? How would this play out if the tenant, who contracts for supply, contacts the Supplier having been contacted by the MEM?<br>Does this create an increased risk of consumption where such arrangements are not in scope of the current energy Supply arrangements?<br><br>I would assume that in the event that a vulnerable situation is identified then the MEM will undertake a suitable risk assessment before proceeding with the work and will retain such evidence. Should in these circumstances the Supplier be involved due to the additional risk arising from these situations? Should the wording (p.3) be changed accordingly<br>*"to include a provision that the SIP will only be able to re-energise a Metering Point that has been de-energised by the SIP. Where a Metering Point is found to be de-energised when the SIP attends the site, they must may abort the work and must may not change the energisation status."* |

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| | | | The solution around Smart Meters (top of p.4) seems to leave any resolution of problems arising to the Supplier who is not involved until this point. Shouldn't any consequential impact that incurs remedial work/cost be recovered from the relevant MEM?<br>The proposal provides no evidence of likely numbers of cases involved nor the Cost Benefit of providing these arrangements. |
| | | Utilita Energy Limited | The first solution is our preferred option as communication is clearer and most transferable through the DTN compared to SDEP.<br>The Contractual Guidance between the SIP and the homeowner is also preferred as this should take away responsibility from the Suppliers to share customer details with the SIP.<br>While we agree with all on-site checks from the SIP, this may need to be continuously reviewed to make sure all areas are complied with and there are no major losses in smart communications between the Registered Supplier and the Smart Meter. |
| | | British Gas | We have the following comments relating to the proposed process map on Page 5<br>• Page 5 - The decision tree flowchart requires updating from the DCP 394 meeting where the consensus was that if a site is found de-energised the job is aborted until such time that it has been re-energised by the DNO<br>• Page 5 – a number of flowchart boxes have incomplete wording – appears to have been cropped off<br>• Page 5 – cannot envisage ever leaving a site de-energised as our chosen option would be to fit an isolator and leave for electrician |
| | | Imserv | We broadly support both the proposed solutions. |
| | | Northern Powergrid | 3.1 Solution Option 1.<br><u>Contractual Guidance</u>, bullet point 3.<br>"they may abort the work and may not change the energisation status". Using "may" implies the SIP has a choice. Suggest replacing "may" with "must". |

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| | | | <u>On-Site</u><br><br>I think we need to make it clear that the two scenarios of DNO equipment damage/service termination defect and interference/meter damage which prevent the work from being completed are separate. The solution appears to combine them in the text (but not in the table).<br><br>By the nature of the de-energisations requests the supply point in question is highly likely to be registered with an electricity supplier. Therefore, any interference needs to be reported to the supplier – not the DNO. If the supplier cannot be determined by the SIP it is not up to the DNO to identify. Whilst the UKRPA is a route in to report tampers, the better option is to use Crimestoppers which is set up for this purpose.<br><br>If it is the DNO equipment damage or defect that is the problem then it should be reported to the DNO using the established method of phone call for category A or data flow (D0135) for category B.<br><br><u>Communication</u><br><br>It is vital that communication between SIP and DNO (and other parties) is automated via the data flow system. It is impractical to use email as an alternative. Therefore, facility will need to be provided in the dataflow system for a potentially non-appointed MEM of a supply point being able to send the D0135 flow to DNO. Currently it is only the appointed MEM for the supply point who can send the D0135 and receive the D0126 following rectification. |
| | | Scottish Power Energy Retail | We understand the potential advantages from a customer experience perspective, however there are a number of problems, complexities and logistics that would need to be considered and addressed before the or any solution progresses to implementation.<br><br>Some considerations would be: -<br><br>• We agree any MEM would need to by fully accredited and that they would need to sign to confirm full adherence to any agreed implemented process. |

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| | | | • Any accredited MEM needs to be fully aware of how to identify potential energy theft<br>• What if something goes wrong on the day? Where do the responsibilities lie? What if the SMART communications drop out for one or both fuels? Who picks up the ERC if the meter is 'bricked' as a result?<br>• What expectations and obligations would be on the supplier?<br>• What if an emergency off-supply situation occurs, where do the obligations/expectations lie? This could tie back to DCUSA issue DIF63 (Provision of a supplier 24/7 Emergency Metering Service)<br>• Liability issues – just now the solution proposes that an accredited MEM only notifies a supplier if they are unable to de-energise and re-energise a supply on the same day, it would be our recommendation that suppliers would want to know every time someone touches their equipment. In the event of a subsequent fault, our records would incorrectly show our MEM was the last to work on the device. What would be the mechanism for sharing this information and how would that information be stored? How would we ensure 100% of transactions are recorded?<br>• A central Sealing Plier Database should be in place where we can easily ascertain the meter operator who has worked at a property.<br>• We believe the MEM needs to be fully responsible for actions undertaken at the property and for any damage to supplier's equipment.<br>• Clarification of scenarios and expansion on what transactions by the accredited SIP will be allowed. Will this be fully prescriptive of what is allowed and what is not allowed? We would not want an accredited MEM to move any existing supplier equipment.<br>• There seems to be no mention of notifying the appointed MEM/supplier unless there is an issue re-energising – meters might suddenly flag reverse run and in the case of AMR sites the MEM could end up with D0001 fault reports as they are not aware a site is now generating and any associated drop in consumption might also trigger a D0001 from a Supplier querying advances and |

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| | | | suggesting meter faults where none exist. This also includes any meter capable of recording readings in half hourly intervals.<br><br>• If implemented our preference would be flow driven – we believe this requires further discussion. SDEP was not built to allow MEM access, it was primarily for Suppliers and DNOs. We need to be clear on the costs and who would be responsible for these if this is implemented. Flow process would need to be fully operational<br><br>• What would the audit and/or performance assurance process look like? We believe a robust auditing process should be in place.<br><br>• If additional information is captured on site e.g. photos of the meter, how would a supplier get visibility?<br><br>• What if an accredited MEM installs dangerous equipment? (example EV installers installing insulation piercing connectors designed for overhead lines and not meter tails) Who would follow up on this? What would be the process for reporting this?<br><br>• All the MEM documentation needs to be updated to reflect the change.<br><br>• How will a MEM know which supplier to engage with? Is it only based on what a customer advises? As they are an accredited MEM will they have access to ECOES?<br><br>• If they are accredited MEMs does that mean they become code signatories?<br><br>• We suspect that this may trigger SMART alerts. Provided the supplier is notified, they can choose to ignore tamper alerts; however, there is considerable risk in doing so: e.g. should they ignore for a period of time because the work is to be carried out over a number of days? When to start acting on alerts again? The SMART alert process would need to be fully reviewed to ensure Suppliers do not get 'false positive' reports and consideration needs to be given to the timeline. |

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| | | | • How will the homeowner/landlord know who to engage with if there are any issues after the work is carried out?<br>• Has there been engagement with the UKRPA regarding provision of leads? |
| | | SP Network | SPEN are supportive in principal to this change, however there are several areas that still require refinement under DCP394.<br>We would clarify that this is a Supplier/SIP process and that the SLA's to be considered lie in this area and not with the Distributors and as such there should be a legal framework around liability and indemnity. |
| | | SSE | Although we appreciate this change will be reviewed in parallel with the DCUSA working group where further discussions have been held, we would like to raise the following points –<br>• We do not believe the SIP should be acting on an 'All reasonable endeavours' basis to identify a supplier<br>• It is vital that the new Market Participant SIP is created, and participants do not use 'M'.<br>• The SIP should be required to receive the Suppliers approval prior to carrying out work on the supply. This notifies the supplier which SIP has been contracted and will ensure the supplier is prepared to receive dataflows from the appointed SIP and compels the SIP to identify the supplier.<br>• Without the supplier identification by the SIP, the DNO will be informing the supplier of a change of energisation via the D0139. The DNO / Supplier D0139 process is currently not always followed.<br>• The flow matrix on page 6 of the document is confusing and does not follow the process.<br>• We are concerned about not receiving notification of a site's re-energisation and the extra expense this could involve for a site visit to confirm. |

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| | | Ovo | OVO does not support solution options 1 or 2 or the alternative solution as defined within the R0021 Impact Assessment papers. Reasons for this are detailed below. OVO supports the exploration of a third option:<br><br>*Where a property owner with multiple suppliers wishes to perform works at a site that requires de-energisation and re-energisation, the supplier that is first contacted with the request will contact all relevant suppliers who will have a 10 working day obligation to install an isolator switch at the premises. Contact method would be pivotal: a dedicated SDEP channel in which all affected suppliers/MEMs/DNOs are notified. This same channel will be notified of an isolation date (on which isolation switches will effectively deenergise the site) to faciliate the management of smart meter alarms, customer contact, and any other isolation related events.*<br>This would ensure that the supplier can manage the relationship with their customer, facilitate net zero, and negate the need to alter MEM contracts, create new flows, open up questions on liability, necessitate accession to DCUSA, create new obligations on who manages issues and how, who the customer needs to pay, what happens to smart alarms, what the boundaries of the role of the SIP are (there would be no SIP).<br>OVO understands the use case that is driving solution options 1 and 2, but we have material concerns on how it will work in practice and how significant issues therein will be managed/owned/mitigated.<br>Smart there is distinct lack of referencing to Smart metering. Any action carried out by a SIP will trigger events and alarms to both the Supplier and DNO. Any time a meter is de-energised the CH sends a AD1 alert to both the Supplier and the DNO. The DNO is required to investigate these and one of the first things the do is check with the Supplier to see if we've requested anything. Option 3 would allow DNOs and Suppliers clear oversight.<br><br>Operational issues with smart Secondly, we've come across situations where installations carried out to install Low Carbon Technologies (i.e. PV boards) have then interfered with the Smart meter. If the SIP carries out options 1 or 2 without the suppliers knowledge and then we find the devices no longer |

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| | | | communicate, this will trigger site visits and triage actions. If such a situation arises, we believe process steps should be covered within the modifications solutions. Option 3 would mean that such issues would be managed as they currently are via BAU processes. If options 1 or 2 are followed the following would need to be answered: who will be liable to resolve smart issues? Would the SIP be making the customer aware? Would the SIP be taking on the liability for the correction needed?<br><br>Liabilities Thirdly, what about liabilities on site? If the SIP is not acting on the request of the Supplier as an appointed agent, and issues arise, in today's world that falls to the Supplier to rectify. In this scenario, will the SIP have to maintain liability cover direct with the customer if their work causes any RIDDOR or other reportable problem? These are recorded and monitored as part of the Smart Programme and we have reporting obligations. Would liability be split? This issue would be mitigated by option 3.<br><br>Customer issues How will we know this if the customer needs to come to us about any issues arising. For example, if an engineer stomps dirty bootprints into their hallway or similar issues that are raised due to engineers being on site? Currently, this is mostly managed by the supplier via contracts with the MEM. Option 3 would allow for issues to managed via BAU processes.<br><br>Payment In options 1 and 2, who does the customer pay for this? Will the SIP manage all that? Option 3 allows the registered supplier to manage costs with their MEM.<br><br>Smart What happens to the alerts/alarms in the Smart meters when the fuses are pulled? Within R0021 papers it is noted that smart connectivity needs to be maintained. However, alerts are not covered so far and should be further explored within the change proposal. Option 3 would ensure that all affected suppliers, MEMs and DNOs would be informed.<br><br>Appointment Does the SIP need to be formally appointed or just hold a valid contract? We note REC's desire to increase service providers. However, entry criteria for becoming a SIP are limited within R0021 and would be good to expand upon. Appointment issues, again, would be mitigated by Option 3. |

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| | | | Contact issue It appears that the supplier/DNO knows the SIP is attending the site in retrospect via D0139, D0135, D0156, D0001 flows. It would be good to explore whether parties would need to be aware of visits in advance eg. if there is already work scheduled at the site, or if there's a power emergency, etc. Option 3 mitigates this issue as clear contact is made throughout the process. |
| | | WPD | The solution to allow an accredited MEM under a new role of a SIP (Safe Isolator Provider) will have a significant impact on ourselves as a DNO if communication routes are not agreed ahead of implementation.<br>As a DNO we overall welcome the new role in to the market as it will allow Network Operators to focus more on maintaining and upgrading the network for the future energy increases from the net zero deadlines being set by the government. Currently WPD deals with several thousand requests for isolation or requests to install isolation switches each year, and while it is a service we can offer it drains resources especially in recent times with the increase of LCT installations. |
| 2 | Do you have a preference for Option1 or Option 2 | GazProm | No Preference |
| | | Utilita Energy Limited | Option 1 |
| | | British Gas | Our preference would be Option 1.<br>This option can utilise existing Market Messages via existing communication methods and will help minimise any manual workarounds that may be required under Option 2. |
| | | Imserv | We prefer Option 2 as it will be easier to implement. Is there a need for a REC accredited MEM to accede to DCUSA, if as highlighted, the MEM is already competent and is taken through a regular audit program, to complete this type of work or similar. |
| | | Northern Powergird | Yes. Option (solution) 1. In terms of the communication of the energisation status changes and asset condition reporting our preference would be using existing data flows. Using SDEP in option 2 would be manually intensive to process and update our system. |
| | | Scottish Power Energy | If a solution was progressed our preference would be Option 1, the use of market messages over the DTN. How would that work in practice as flow exchanges normally rely on being appointed in the |

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| | | | MEM system? – We would effectively need to be listed as a SIP with all Suppliers for all MPANs. This undermines the supplier hub principle.<br>What are the costs of manual flow creation? If implemented, we need to ensure that it is a fully efficient process which does not drain resources. As previously stated, we would want these communications to include every transaction involving our metering equipment. How will the MEM know which MPAN to provide the market message against? As stated previously further discussions and potentially a workshop would be required to fully understand how this would work in practise.<br><br>SDEP is a purely manual communication tool at present with no immediate introduction of an API planned, therefore we do not believe Option 2 is a viable option. |
| | | SP Networks | There is no difference between Option 1 and Option 2 other than the Communications method.<br>At this point we have concerns on both options, as noted below.<br><br>SDEP is currently not a robust auditing tool and as such where there are potentials for safety issues, we do not believe that this is a viable option for managing notifications in this process.<br><br>We have concerns regarding the utilisation of the D0135 Asset Condition flow.<br>DCP195A was designed for service termination intervention requests for Smart and non-smart metering only. This process would potentially see a rise in these instances. While aspects of this are reportable on our Ofgem return and potentially recoverable where they relate to Smart/non smart metring there is no inclusion for safe isolations and re-energisation. |
| | | SSE | Our preference is Option 1. Using the official flow process allows for the process to be better monitored and bad performance called out. |
| | | Ovo | We prefer option 3 as noted above. |
| | | WPD | Our preference would be Option 1. This would facilitate automated messages being generated if the following key points could be overcome:<br>1. If the MEM is not associated to the Registered Supplier how will the Accredited MEM communicate with the Supplier/DNO? Option 1 would be to generate a Market Message through CSS however current validation rules will reject a |

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| | | | Market Message from an agent who is not the registered Supplier Appointed Agent. This would require significant system changes.<br>Option 2 is proposing that SDEP could be used to communicate to the supplier and/or DNO however as this is a manual input it will not generate a flow into our system to update the status of an MPAN and therefore would require additional resource to oversee this manually intensive process.<br>2. How will the Accredited MEM (SIP) know who the Registered Supplier is?<br>3. How will the Accredited MEM (SIP) know if it is an IDNO?<br>4. If there is a fault after the Accredited MEM (SIP) has attended site – who is liable for the cost of fault repair?<br>5. We have concerns around the sharing of PSR information with effectively third parties. Our experience is that not all vulnerable customers are comfortable with landlords or third parties having access to any of their PSR data. We would therefore suggest further guidance is sought from the ICO on any GDPR implications with this element of the proposal.<br>6. If equipment is identified as dangerous or defective what reporting route/process is to be used by the SIP. |
| 3 | Do you agree with the chosen communication market message/flows set out in the solution? | GazProm | No Comment |
| | | Utilita Energy Limited | yes |
| | | British Gas | We agree with the chosen market messages set out in this solution |
| | | Imserv | Yes, but prefer the DTN model. |
| | | Northern Powergrid | Yes – but noting comments made in Q1. |

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| | | Scottish Power Energy | The proposed market messages are D0136, D0139 & D0001, in addition we also propose D0002, D0135 & D0126 these would need to be investigated. As stated in Q2 more discussion is required on how this would work in practise including any cross-code impacts with DCUSA. |
| | | SP Networks | SPEN are of the view that market messages/flows are the preferred option, however as per response above have issues in the utilisation of the D0135 message in relation to DCP394 as there is no funding mechanism in place for defects associated with the isolation and re-energisation process. We could not support this change until this is addressed |
| | | SSE | Yes, the communication method is fine as we understand it, but we would like to see it presented properly in the flow Matrix which currently does not represent the correct flows for the correct situation. |
| | | Ovo | OVO does not agree with the use of flows. MHHS is currently looking at amending these.<br>Option 3 supports the use of a centralised messaging system such as SDEP to ensure all relevant parties are informed throughout the process. |
| | | WPD | As per Q2 our preference would be Option 1 using Market Messages/flows to communicate to parties. |
| 4 | What lead time would be required for your business to implement the change proposal if it were approved | GazProm | No Comment |
| | | Utilita Energy Limited | Medium (6-12months) lead time, In theory R0021 should technically not take as long to implement as there are no new DTN Market Messages, but instead, R0021 is just enabling access to the current market messages for the SIP. The SIP is then allowed to send and receive market messages from Registered Suppliers and DNOs. |
| | | British Gas | We would require a lead time of 8 – 12 weeks to configure our systems to accept flows from a SIP |
| | | Imserv | There should be minimal lead time to implement the CP, if model 1 is chosen. |
| | | Northern Powergrid | Due to the short timescales associated with this request we have not been able to request a detail impact assessment from our service providers although we believe a minimum of 6-9 months would be required. |
| | | Scottish Power Energy | This would depend on the solution, but we think a minimum of 18 months. Currently there is not enough information to do full impact assessment, however if we proceed based on an Option 1 type |

<table>
<tr><th>No</th><th>QUESTION</th><th>RESPONDENT</th><th>RESPONSE</th></tr>
<tr><td></td><td></td><td></td><td>solution we believe it would require a fundamental change as participants would need to be capable of accepting and sending flows/market messages from/to non-registered MOPs.</td></tr>
<tr><td></td><td></td><td>SP Networks</td><td>We would suggest a minimum of 6 months from the time that all related changes are agreed.</td></tr>
<tr><td></td><td></td><td>SSE</td><td>We currently do not have an indication of the required lead time for this change, however any changes to data flows should have at least a 6 month lead time from the agreement of the change.</td></tr>
<tr><td></td><td></td><td>Ovo</td><td>6 month lead time would be suitable for option 3. Longer for options 1 and 2 as there would need to be contract negotiations, accessions, training, systems changes, so on.</td></tr>
<tr><td></td><td></td><td>WPD</td><td>Option 1 would involve a significant change to our systems should the communication method issue be resolved. Therefore we would require a minimum 12 month lead time to implement this change.</td></tr>
<tr><td rowspan="7">5</td><td rowspan="7">Would your business incur any costs from implementing this change - if so please provide details</td><td>GazProm</td><td>-</td></tr>
<tr><td>Utilita Energy Limited</td><td>-</td></tr>
<tr><td>British Gas</td><td>-</td></tr>
<tr><td>Imserv</td><td>-</td></tr>
<tr><td>Northern Powergrid</td><td><table>
<tr><th></th><th>DESIGN/ DEVELOPMENT COSTS</th><th>IMPLEMENTATION COSTS</th><th>ONGOING OPERATIONAL COSTS</th></tr>
<tr><td>DNO SYSTEM</td><td>£5000</td><td>£5000</td><td>£1000 PER ANNUM</td></tr>
<tr><td>CUSTOMER RELATIONSHIP MANAGEMENT SYSTEM</td><td>£6000</td><td>£3000</td><td>£0 PER ANNUM</td></tr>
</table><br>Please note, due to the short timescales associated with this response these costs are a high-level estimate only; we will need to initiate a full impact assessment with our service providers.</td></tr>
<tr><td>Scottish Power Energy</td><td>Depends on the option implemented. Option 1 could be fully automated, which would be our preferred solution. Without the API, Option 2 would be a complete manual process requiring resources which we do not have.<br>As per Q4 there is not enough information to make full impact assessment, as not yet sure of expected volumes etc but we would expect IT costs.</td></tr>
<tr><td>SP Networks</td><td>-</td></tr>
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| | | SSE | Unknown at this time. |
| | | Ovo | Yes. This would increase FTE, and the development of systems processes and boots on the ground. This would create more work for the DNOs also. Uptake of the solution would dictate the volume of cost. |
| | | WPD | We will incur costs for implementing this change however due to the fact the solution is not developed enough we are unable to provide indicative costs at the moment. Once the solution has been fully developed we will then be in a position to advise what costs will be incurred. |
| 6 | Can you identify any benefits to your business from implementing theis change | GazProm | No Comment |
| | | Utilita Energy Limited | The benefits are already highlighted in the Change Proposal. |
| | | British Gas | We believe this change would positively benefit consumers. Currently consumers who require a de-energisation to occur are required to contract directly with their energy Supplier for this service. This change will allow consumers to use a qualified SIP to provide this service and this will help facilitate the implementation of low carbon technologies and electrical vehicle chargers.<br>As an Energy Supplier our priority is the smart meter roll-out and our resources are fully engaged in this activity.<br>This change will potentially increase the pool of resources available to provide isolation services to consumers. |
| | | Imserv | The benefits to our businesses, would be to operate for multiple suppliers, end users & partners.<br>By being a REC accredited MEM. Alt parties would have confidence that the criteria set out in the various user stories would be fulfilled<br>It would also go some way to support the ALT-HAN crowded meter room proposal currently out to tender. |
| | | Northern Powergrid | Yes. We believe it is supplier responsibility to de-energise supply points in the circumstances of this proposal. We do still get requests to de-energise in the circumstances (often for isolators to be fitted) from end customers as they cannot get their supplier to instigate the work. Our response is to pass them back to supplier which is not only very frustrating for the customer but it also takes up valuable contact centre agent's time. |

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| | | | If this proposal is accepted it will provide many more options for the work to be carried out by a SIP which will not only give customers more choice it will reduce the risk of customers electricians de-energising illegally. |
| | | Scottish Power Energy | It could potentially free up resources for other jobs, but it could also cause missed opportunities to install SMART meters, as the supplier will not have had the opportunity to discuss with the customer. It is an over-arching benefit for the industry rather than any individual supplier, as it reduces the risk of the work being carried out illegally. |
| | | SP Network | SPEN see a benefit for DSO's as it removes a responsibility by Legal text for DSO companies to provide isolations and reenergisations, this will further assist DSO's with challenging RIIO ED2 deliverables |
| | | SSE | We could potentially see a benefit in the reduction of booking agent appointments to reduce the lead in time for consumers. However, we do not currently have a view on any further benefits this could introduce. |
| | | Ovo | The cost of options 1 and 2 outweigh the benefits. However, option 3 would allow net zero and customer benefits of R0021 to be realised without the need for a large body of change. |
| | | WPD | As a DNO we overall welcome the new role in to the market at is will allow Network Operators to focus more on maintaining and upgrading the network for the future energy increases from the net zero deadlines being set by the government. Currently WPD deals with several thousand requests for isolation or requests to install isolation switches each year, and while it is a service we can offer it drains resources especially in recent times with the increase of LCT installations |
| 7 | taking both the costs and benefits into considerations seen by your business, do you consider this | GazProm | At this stage and with the number of outstanding questions set out in 1 above we do not support |
| | | Utilita Energy Limited | No |
| | | British Gas | We consider this change should be made. This change will potentially increase choice for consumers when requesting safe isolation services and will ultimately help support the industry in achieving its Net Zero targets. |
| | | Imserv | Yes |

| No | QUESTION | RESPONDENT | RESPONSE |
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| | change should be made? | Northern Powergrid | Yes |
| | | Scottish Power Energy | The MOP element of the business does not agree with implementing this change as currently drafted, as the risks outweighs any benefit.<br>From a supplier perspective we can see the benefit to the customer, better customer experience (one stop shop) and it can reduce demand for isolator installations, however more consideration as per Q1 needs to be given to any solution e.g. SMART communications dropping out.<br>With the current SMART installation targets this would free up resource however if implementation is to be considered tight controls need to be in place. |
| | | SP Networks | SPEN believe that if the appropriate funding issue is resolved to ensure no detriment to parties then there is benefit to the Industry in implementing this. |
| | | SSE | We do not see any benefits to the supplier market, only to the SIP and consumers. If the process was improved as per question 1, then the change should only be progressed at that time. |
| | | Ovo | We would be potentially be supportive of option 3 if there is a proven business case for this. We are not supportive of options 1 or 2.<br>As the volumes of customers requesting this are currently unknown, it is not possible to confirm whether there's any benefit of this modification. |
| | | WPD | We can see benefits for this solution to be progressed but have concerns around the key points identified in Q2.<br>If the MEM is not associated to the Registered Supplier how will the Accredited MEM communicate with the Supplier/DNO? Option 1 would be to generate a Market Message<br>1. through CSS however current validation rules will reject a Market Message from an agent who is not the registered Supplier Appointed Agent. This would require significant system changes.<br>Option 2 is proposing that SDEP could be used to communicate to the supplier and/or DNO however this is a manual input and will not generate a flow into our systems to update the status of an MPAN.<br>2. How will the Accredited MEM (SIP) know who the Registered Supplier is?<br>3. How will the Accredited MEM (SIP) know if it is an IDNO? |

<table>
<tr><th>No</th><th>QUESTION</th><th>RESPONDENT</th><th>RESPONSE</th></tr>
<tr><td></td><td></td><td></td><td>4. If there is a fault after the Accredited MEM (SIP) has attended site – who is liable for the cost of fault repair?<br>5. We have concerns around the sharing of PSR information with effectively third parties. Our experience is that not all vulnerable customers are comfortable with landlords or third parties having access to any of their PSR data. We would therefore suggest further guidance is sought from the ICO on any GDPR implications with this element of the proposal.<br>6. If equipment is identified as dangerous or defective what reporting route/process is to be used by the SIP.<br><br>As a DNO we overall welcome the new role in to the market at is will allow Network Operators to focus more on maintaining and upgrading the network for the future energy increases from the net zero deadlines being set by the government. Currently WPD deals with several thousand requests for isolation or requests to install isolation switches each year, and while it is a service we can offer it drains resources especially in recent times with the increase of LCT installations</td></tr>
<tr><td rowspan="4">8</td><td rowspan="4">Do you have any additional comments relating to this change?</td><td>GazProm</td><td>See comments in 1 above</td></tr>
<tr><td>Utilita Energy Limited</td><td>None</td></tr>
<tr><td>British Gas</td><td>We have anecdotal evidence that many thousands of meter points are being de-energised and re-energised each year by unauthorised personnel. This change will provide more choice for consumers and should help reduce the number of unauthorised de-energisations</td></tr>
<tr><td>Imserv</td><td>We believe REC accredited MEMS need some protection where a SIP works on a meter where they are the appointed meter operator. This could be covered in a couple of new market participant stories:-<table><tr><td>M5</td><td>As a REC Accredited Metering Equipment Manager of the meter a SIP has worked on, I would like to be notified of what work has been done and when within 5 (for example) working days of completing the work.</td></tr></table></td></tr>
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| No | QUESTION | RESPONDENT | RESPONSE |
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| | | | M6 — If a SIP needs to deenergise a meter for more than 12 hours (for example) then the SIP will notify the relevant REC Accredited Metering Equipment Manager for that meter to avoid any unnecessary site visits (eg where the Suppliers reports fault on the meter because they can't communicate with it). |
| | | Northern Powergrid | Yes. This solution is likely to see some DNO equipment intervention requirement. As the work is not metering work and, therefore, a smart meter will not be fitted it could be categorised as a pro-active intervention to allow a smart meter to be fitted at a later date. Therefore, we just need to be clear if this comes under the category for funding as a pro-active smart meter intervention. |
| | | Scottish Power Energy | We are responding as a joint response for the MOP and Supplier business.<br>There is nothing seeking permission from a supplier for a SIP to undertake work on their metering equipment and are not part of the conversation. Do we need to consider supplier permissions and communications?<br>The proposal is also not clear on liability and we see this as increased unacceptable risk to our business. This is too technical an issue to be implemented without a workshop of industry experts to discuss and fully understand any proposed solution. |
| | | SP Networks | None |
| | | SSE | There is no option to compel customers to have a Smart meter installed before appointing a SIP. This would allow the supplier to remote disconnect the supply whilst keeping the site energisation status. |
| | | Ovo | • In options 1 and 2, if another suppliers MEMs are tightening meter tails, how do we ensure the competency of those MEMs.<br>• In options 1 and 2, the process to do so would also cause a host of smart meter alerts – how would these be managed?<br>• In options 1 and 2, allowing other MEMs to interfere with our meter would cause us more work.<br>• In options 1 and 2, if the SIP makes errors would it need to be another SIP that rectifies those errors?<br>• In options 1 and 2, this would need new systems and processes. How would these be paid for? |

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| | | | • What details would need to be capatured for options 1 and 2?<br>• Are the flows for options 1 and 2 going to be ditched for MHHS?<br>• DNOs have already confirmed through DCP394 that they're not supportive of options 1 and 2. How will this change the outcome of R0021?<br>What will the uptake of this modification be? Is there even a business case for this? |
| | | WPD | We have found this difficult to respond as details of DCP394 has not been shared with this proposal. |