



## DCUSA Change Report

# DCP 253 – ‘Retightening and Remaking of Whole Current Metering System Terminal Connections’

### Executive Summary

DCP 253 seeks to permit a DNO/IDNO, when it replaces its service cut-out, to retighten the meter tails connecting into and out of a whole current meter and/or remake connections to meter terminals as necessary prior to re-energisation.

This document presents the Change Report for DCP 253 and invites all Parties to vote on the following:

- whether to accept or reject DCP 253, noting whether or not DCP 253 better facilitates the DCUSA Objectives; and
- the implementation date for DCP 253.

The voting deadline for DCP 253 is **15 July 2016**.

## 1 PURPOSE

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- 1.1 This document is issued in accordance with Clause 11.20 of the DCUSA and details DCP 253 – *‘Retightening and Remaking of Whole Current Metering System Terminal Connections’*.
- 1.2 The voting process for the proposed variation and the timetable of the progression of the Change Proposal (CP) through the DCUSA Change Control Process is set out in this document.
- 1.3 Parties are invited to consider the proposed amendments (Attachment 2) and submit their votes using the form attached as Attachment 1 to [dcusa@electralink.co.uk](mailto:dcusa@electralink.co.uk) no later than **15 July 2016**.

## 2 EXECUTIVE SUMMARY

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- 2.1 DCP 253 was raised by UK Power Networks on the 03 November 2015 to permit a DNO/IDNO, when it replaces its service cut-out, to retighten the meter tails and customer tails connecting into and out of a whole current meter and/or remake connections to meter terminals as necessary prior to re-energisation.
- 2.2 Over a period of six months the DCP 253 Working Group met four times and issued one consultation. The consultation requested Parties views on providing permission to Distributors to retighten the meter terminals prior to re-energising the meter and their views on proposed Clause 25.23.
- 2.3 The Working Group unanimously supports the principles of this change and the legal text.

## 3 BACKGROUND TO THE DCP 253 CHANGE PROPOSAL

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- 3.1 DCUSA Issue Form (DIF) 041 highlighted (following court case RMISSE<sup>1</sup>) the elevated risk in relation to the DNO replacement of the service cut out where the meter terminals are disturbed despite best endeavours when the issue was raised in June 2014. This led to a concern over liability due to acts or omissions which might lead to an increased fire risk at the service termination / metering position. The group agreed that a solution to this issue is

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<sup>1</sup> The High Court decision dated 17<sup>th</sup> September 2012 on Case Nos: HT-10-95, HT-10-210, HT-10-??, HT-10-427 and HT-11-163 in respect of "Repair, Installation, Maintenance and Inspection of Supply Side Equipment", Neutral Citation Number: [2012] EWHC 2541 (TCC)

required to enable the DNO to discharge its statutory and licence obligations to replace and maintain its systems.

- 3.2 A Request For Information (RFI) was issued in October 2014 to ask Parties to provide their views on four solutions. All respondents preferred Option 1 as set out below:

**Option 1 - DNO Retightening Prior to Re-energisation**

*“DNOs to be consented through a DCUSA Change Proposal to work upon metering systems consequent to modification/replacement of the DNO service equipment, to retighten metering terminals and/or remake meter tail or customer tails, as appropriate, to ensure the safety of the supply equipment. This option would necessitate the provision of Smart Meter software keys to the DNOs to temporarily disable tampering alerts and potentially special screw drivers for certain meter types.*

*This option would ensure that terminals were retightened prior to re-energising the supply and would present the very lowest risk possible with minimum co-ordination”.*

- 3.3 A formal change proposing Option 1 as its solution was raised in November 2015.

#### **4 INTENT OF DCP 253 CHANGE PROPOSAL**

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- 4.1 DCP 253 has been raised by UK Power Networks to permit a DNO/IDNO, when it replaces its service cut-out, to retighten the meter tails and customer tails connecting into and out of a whole current meter and/or remake connections to meter terminals as necessary prior to re-energisation.

- 4.2 This CP has been designated as a Part 1 Matter as the proposed change impacts both Distributor and Supplier Parties liabilities in regards to the designated Party retightening the meter terminals.

#### **5 DCP 253 WORKING GROUP**

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- 5.1 The DCUSA Panel established a Working Group to assess DCP 253. The Working Group met on four occasions and was comprised of Supplier, DNO and AMO representatives. Meetings were held in open session and the minutes and papers of each meeting are available on the DCUSA website – [www.dcusa.co.uk](http://www.dcusa.co.uk).

- 5.2 All Working Group members were supportive of the general principle of DCP 253.

## 6 WORKING GROUP ANALYSIS OF DCP 253

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- 6.1 The Distributor has a separate requirement to make safe and leave an installation in a condition that is fit for service. In an emergency situation where the meter tails or meter terminals are impacted it may not be practical to wait until a Meter Operator (MoP) can attend the site to undertake works or to leave the customer without service especially if the customer is on the Priority Service Register.
- 6.2 The Working Group considered that this CP addresses outstanding issues around liability by ensuring any work undertaken on meter tails and meter terminals to make the installation safe is subject to a formal arrangement. The Working Group also considered that an additional scenario where an incoming meter terminal is disturbed fits within the spirit of the intent of this change.
- 6.3 A Energy Network Association (ENA) paper containing reasons why a Distributor may wish to access the terminal connection on metering equipment is included as Attachment 5 to this report, as supporting information.
- 6.4 The Meter Operation Code of Practice Agreement (MOCOPA) recognises that Distributors have access to meters and includes a requirement for DNOs to seal meters after access, thus identifying the last party to work on the installation. The Working Group propose that all work is carried out in line with the processes set out in the MOCOPA guidelines.

## 7 DCP 253 CONSULTATION ONE

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- 7.1 The Working Group carried out a consultation (Attachment 4) to give DCUSA Parties and other interested organisations an opportunity to review and comment on the proposed DCP 253 solution. The Working Group identified three key areas (liability, competency and tampering) that required feedback from industry parties to aid the Working Group in drafting a holistic solution.

### Liability

- 7.2 The distributors' duty to indemnify the User for work undertaken by the Company is set out in DCUSA Section 2A Clause 25. This CP proposes to add Clause 25.23 (Attachment 2) to provide permission for the Company to access the terminals of the whole current Metering System to tighten those terminals. Under the Meter Operation Code of Practice (MOCOPA)

a list of identification letters imprinted on Meter Operators' (MOPs) and Distributors' seals is maintained by a registration authority and shared with the relevant parties. This seal potentially identifies the last Party to work on-site.

- 7.3 In the scenario where an installation has been destroyed as part of a fire, there may in some instances be no seal recovered to determine who was the last Party to work on the meter or service termination. To mitigate this scenario, the Distributor would be obliged to maintain records each time a meter is accessed and make them available on reasonable request. The Working Group agreed to add a new Clause 30.18 to cover exchange of information in respect of incidents equally for both the Supplier and the Company to the legal text.
- 7.4 Any disturbed cable identifiers will be maintained in line with the MOCOPA methodology. The Working Group sought Parties' views on the best practice for recording on-site work, potential liabilities from this work and if any of the recorded information should be shared in the consultation set out below.

### **Competency**

- 7.5 The Working Group proposed that Distributors should cover the competency of their staff under their own training arrangements in line with the relevant Distribution safety rules and the applicable MOCOPA requirements. The Working Group sought Parties' views as to whether this approach is sufficient or if there are any other training matters that the Working Group should take in to consideration.

### **Tampering**

- 7.6 If a Distributor's operative accesses high risk metering equipment such as a security block and a tamper proof arrangement and replaces it then it will impact the Theft Risk Assessment Service (TRAS) arrangements. The Working Group sought Parties' views on how to best record this information so that it may be captured in a MOCOPA advice document and recommended as a consequential change for MOCOPA.

### **Consultation Respondents**

- 7.7 There were ten responses received to the consultation. Six respondents were DNOs, three respondents were Suppliers and there was one IDNO respondent. The Working Group discussed each response and its comments are summarised alongside the collated consultation responses in Attachment 4.

7.8 A summary of the responses received, and the Working Group's conclusions are set out below:

**Question 1: Do you understand the intent of the DCP 253 change?**

7.9 All respondents understood the intent of the CP.

**Question 2: Are you supportive of the principles of the DCP 253 change?**

7.10 All respondents were supportive of the principles of the CP.

**Question 3: Do you have any comments on the GP term as set out in the proposed legal text?**

7.11 Six respondents had no comments on the proposed legal text. Four DNO respondents requested that the draft legal text be clarified on the following points:

Author	Draft Legal Text Comments
Respondent	<p>One respondent advised that the <i>“legal text may need to be clearer in terms of when a DNO has permission to access the meter terminals. For example, what if a DNO arrives at a property and finds that the meter terminals appear to be loose or there are signs of overheating or arcing, before the DNO has performed any work activities. The DNO should have permission to access the meter terminals and remedy the situation as necessary”</i>.</p> <p>The respondent highlighted this sentence for amendment purposes <i>“to remedy possible disturbance of the connections to the whole current Metering System that may have arisen as a consequence of the Company’s actions”</i>.</p>
Working Group	<p>The Working Group agreed to amend the legal drafting highlighted to reflect that Distributors can access the meter terminals if the work required is a result of unintentionally found or left loose meter terminals.</p>
Respondent	<p>This respondent also advised that there would be circumstances where it <i>“it is necessary to temporarily move a meter to allow the DNO work to be undertaken, such as when a security bridge is installed”</i>.</p>
Working Group	<p>The Working Group considered the example where the meter and its cut-out are closely coupled and the meter needs to be temporarily removed to allow for the cut-out to be replaced. Members considered whether the movement of meters was in the scope of this change. The group considered that the addition would need to be defined as the removal of the meter and replacement in its</p>

	<p>existing location. The following wording was proposed in the event that the DCUSA Panel agreed with the Working Groups view that meter removal fits within the intent of the change:</p> <p><i>“Where the Company’s work could only be facilitated by the temporary removal of the meter, permission is given to temporarily remove meter equipment and replace in its existing position”.</i></p>
Respondent	<p>Another DNO respondent requested that the legal text clarify the wording <i>“those terminals”</i> to state whether it referred to the incoming and outgoing terminals. This respondent considered that <i>“on the same safety grounds as for the supply side, that DNOs should also be permitted to tighten the customer side terminals and that this should be absolutely clear in the text”</i>. The respondent suggested that the Working Group consider adding legal text which would allow the DNO to temporarily move a meter for instances such as when a security bridge is installed. Currently a Meter Operator would be required to attend the site if a meter move was required.</p>
Working Group	<p>The Working Group agreed that the purpose of the legal text was to provide access to both the incoming and outgoing terminals.</p>
Respondent	<p>One respondent suggested that the legal text <i>“define that reference to meter terminals includes supply terminals, load terminals and ancillary wiring”</i>.</p>
Working Group	<p>The Working Group referred to their clarification of the legal text in relation to the first point raised above. Members noted that any work undertaken should not disturb anything after the meter. Members noted that as ancillary wiring is a terminal on the meter, it has been intrinsically covered.</p>
Respondent	<p>Another DNO respondent proposed the following legal text to more clearly set out access to the terminals and the associated liabilities.</p> <p><i>“In circumstances where the Company may replace, maintain or operate Connection Equipment that provides the connection to a Metering Point that is measured for settlements with a whole current Metering System, the user permits access to the terminals of the whole current Metering System to adjust those terminals and where appropriate remake the connections to those terminals to remedy possible disturbance of the connections to the whole current Metering System that may have arisen as a consequence of the Company’s actions”.</i></p>

Working Group	<p>The Working Group noted that the proposed wording covered both the incoming and outgoing terminals. The Working Group agreed that the legal text needs to include circumstances where the meter terminals were unintentionally found or left loose and revised the legal text as follows:</p> <p><i>“In circumstances where the Company may replace, maintain or operate Connection Equipment that provides the connection to a Metering Point that is measured for settlements with a whole current Metering System, the user permits access to the terminals of the whole current Metering System to adjust those terminals and where appropriate remake the connections to those terminals to remedy possible disturbance of the connections to the whole current Metering System that may have unintentionally arisen <del>as a consequence of the Company’s actions</del>”.</i> ”.</p>
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**Question 4: Should the DNO record access to the meter and where should this information be recorded?**

7.12 Respondents provided the following suggestions on how to best record DNO access to the meter:

- Three respondents suggest that the DNO should fit DNO specific seals to the meter cover and any other equipment disturbed, as per MOCOPA.
- Five respondents considered that DNOs and IDNOs should record access to the meter via their own specific method of storing information. A Supplier respondent suggested two reasons for this information to always be recorded:
  - I. If a smart meter is accessed, then a cumulative set of alarms may be set off that could indicate fraudulent activity has taken place and this could be ruled out with the knowledge of intervention events.
  - II. Secondly there may in a small number of circumstances be damage occurring through negligence etc. resulting in a fire. If the sealing equipment is missing or becomes destroyed, then there is no auditable account of any activity on site by DNO parties.
- One DNO respondent considered that only non-routine information should be reported to the Supplier;
- One Supplier respondent requested that some form of notification is required. *“All DNOs should supply this information to MOPs by local arrangement. From a Scottish*

*Power/Revenue Protection perspective our preference would be to receive notification via e-mail or telephone to confirm what work has been carried out”.*

- 7.13 The Working Group discussed the three alerts sent from a smart meter to a Supplier for meter cover removal, power off and power on. If no job is registered on the system that day, the Supplier’s Revenue Protection team will be asked to investigate it (Supply Licence Condition (SLC) 12 ‘Matter Relating to Electricity Meters’). The Working Group agreed to investigate what would trigger a tamper alert and see if there are any signals for a legitimate routine operation. Members noted that a D0126 Asset Condition Report Response/Clearance dataflow would be received by the Supplier for all interventions but not for emergency call-outs. To send a flow, you would need to develop the systems to capture it and then you would need to develop the flows structure to provide the different information leading to significant development costs.
- 7.14 The Working Group noted that information would need to be available on request that the IDNO/DNO had accessed the meter and saved in a free text field that could be reported on separately as a trigger. The Supplier could receive this information through a request for information process.

**Question 5: What if any information should be shared and when should it be shared such as post incident investigation information?**

- 7.15 Respondents provided the following suggestions on which information should be shared:

**Supplier Responses**

- no information should be shared unless there is a specific incident to report.
- the recorded information should be shared within 10 days including any remedial action and observations; and
- as a minimum, the date, type of work and who it was carried out by should be recorded and the information shared by a dataflow post event so that the information is readily available should a request arise.

**IDNO Responses**

- One IDNO respondent suggested that the information be provided in an existing D flow.

**DNO Responses**

- The DNOs obligations to report certain information to Suppliers under Distribution Licence Condition 27 '*Theft, Damage, and Meter Interference*' and under DCUSA Schedule 23 '*Revenue Protection Code of Practice*' is sufficient.;
- The DNO specific meter seals should provide confirmation and noted that MOPs do not report each time they reseal equipment;
- The provision of this information should be dependent on how useful it is to MOPs' asset management. If the information is not useful then recording of post incident investigation information would be the minimum requirement; and
- The time and date of access should be provided together with any directly attributable information, on request from the supplier.

7.16 The Working Group considered that this information was likely to be requested via a dataflow and be due to meter tampering activity. If a MOP has a concern about tampering, the MOP could call the Distributor to check if there was attendance at the site. One member suggested that the predominant meter type is currently traditional meters and not SMETs meters and that this change could act as an interim solution and the communication aspect for SMETS meters could be a future piece of work.

7.17 Members considered that if there was a incident then the Distributor's assurance teams would share the information. The Working Group noted that the Distributor has a duty to indemnify the Supplier in the case of an incident under DCUSA Clause 25.7.1 and the User DCUSA Clause 25.7.2. Furthermore, Clause 30 '*Provision of Information*' and 49.11 provides for the exchange of information between the Supplier and the Company regarding system outages as set out below:

49.11 "The Company and the User shall each cooperate with the other, and exchange information with the other, regarding System Outages on its System that may give rise to claims under this Clause 49".

#### **Question 6: What are the perceived liabilities?**

7.18 Respondents advised what they considered the perceived liabilities to be for this change, some of the responses are set out below:

##### **Supplier Responses**

- Potential damage to meter which would need to be covered by the Distributor; and
- Poorly tightened terminals can result in resistive heating which in turn may result in fire if left undetected. There is also a risk of reverse polarity incidents occurring due

to an intervention such as replacing meter tails in conjunction with the cut-out. Adopting the procedures within MOCOPA should ensure that these are minimised to an infrequent level. This would include additional visual checks on the customer installation.

- Any poor workmanship by the Distributor may result in the MOP being held responsible unless, a robust reporting procedure is implemented and all services equipment and meters were sealed by the Distributor in accordance with the MOCOPA guidelines.

#### **DNO Responses**

- The additional liabilities on the Distributor relate to the events caused directly by the activity of accessing and retightening the meter tails to the same extent as the liabilities of a meter operator accessing the Distributors service termination. In each case if follow up work on the terminals was undertaken, the future liability of the first intervention would cease;
- The value of the liabilities cannot be quantified because it will depend on the circumstances of the incident resulting from a failure to tighten the connections appropriately;
- Distributors would inevitably be involved in a (small) number of cases of accidental damage to metering equipment, which otherwise they would not have been involved with. These would likely arise from situations such as the meter terminal covers breaking on removal or replacement, or terminal screws shearing whilst being tightened. Situations such as these would require MOP attendance to rectify but Distributors should not be liable for any consequential costs; and
- Distributors may also be more likely to be blamed by other parties for incidents involving damage to metering equipment when they have been the 'last party attending' such as where a third party inadvertently displaces meter tails (e.g. in a cupboard under the stairs). This risk applies to both Distributors and MOPs, as proof of 'last party attending' does not indicate that that person had left a defect.

7.19 The Working Group agreed that any liability would be limited to the work carried out by the Distributor. The common thread in these responses is that the procedures under the MOCOPA be followed. The Working Group agreed to investigate whether there are any perceived liabilities from the Distributor accessing the meter under MOCOPA for information purposes. Feedback was received from MOCOPA that as Distributors and MOPs are members of MOCOPA and would be subject to the same requirements there is no additional

risk perceived. Distributors have registered sealing pliers, sufficient training and knowledge to carry out the work and any liabilities are covered under MOCOPA. MOCOPA will review the documents if this change is approved but have not identified any specific issues that would cause the MOCOPA to be changed. Each Distributor will review their training documents against the MOCOPA. Furthermore, limitation of liability is also covered under DCUSA Clause 53.

- 7.20 The Working Group considered the Supplier point on risk of reverse polarity incidents due to the replacement of meter tails. Working Group members noted that where the Distributor removes the tails from a meter to remake them then they would undertake a polarity check as set out under MOCOPA.
- 7.21 The Working Group advised that this change would not require any Party to change their existing insurance indemnities under this work as it will already be covered. The likelihood of accidental damage is very low. If there is local feedback of an increasing number, then a conversation would need to be held between the two respective Parties to rectify the issue.

**Question 7: The Working Group proposes that DNOs cover the competency of staff under their own training arrangements i.e. in line with the relevant DNO safety rules and the applicable MOCOPA requirements. Is this appropriate?**

- 7.22 Nine respondents considered this proposal appropriate and answered 'Yes' to this question. The remaining respondent advised that *"the steps within MOCOPA are broadly aligned with supply point testing and combining both should provide the requisite checks and balances to protect the customer and their equipment"*.
- 7.23 The Working Group considered the responses and agreed that the Distributor attendees would review the MOCOPA requirements against their jointing procedures.

**Question 8: In the scenario where high risk metering is removed (security block) and a tamper proof arrangement is created then it will impact TRAS. Should a supplementary advice document be developed or should it be captured under MOCOPA?**

- 7.24 Five respondents considered that MOCOPA was the appropriate place to capture this arrangement. The general consensus among the remaining respondents was that where security blocks were removed which is the removal of the service of a supply theft arrangement that the DNO/IDNO should notify the Supplier.

7.25 One respondent did not consider that security blocks were catered for under this proposal and that to enable network operator staff to be able to remove the meter to facilitate a cut out change would require a new CP. Another respondent considered that for tamper proof arrangements encountered during the course of works that guidance through a supplementary advice document with visual examples would be appropriate.

7.26 The Working Group agreed that if Distributor come across these security arrangements the Distributor would need to contact the Supplier.

**Question 9: How often would you expect to find high security TRAS arrangements on-site?**

7.27 One Supplier and one DNO respondent advised that they would rarely expect to come across these arrangements on-site. The remaining respondents were unable to provide an estimate.

7.28 The Working Group noted that this situation would rarely occur and it is clear that the Distributor would contact the Supplier where these instances are discovered and it affects the work to be carried out.

**Question 10: Which DCUSA General Objectives does the CP better facilitate? Please provide supporting comments.**

1. **The development, maintenance and operation by each of the DNO Parties and IDNO Parties of an efficient, co-ordinated, and economical Distribution System.**
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.**
3. **The efficient discharge by each of the DNO Parties and IDNO Parties of the obligations imposed upon them by their Distribution Licences.**
4. **The promotion of efficiency in the implementation and administration of this Agreement and the arrangements under it.**
5. **Compliance with the Regulation on Cross-Border Exchange in Electricity and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.**

7.29 The following table provides a summary of the responses to this question.

Respondent Party Type	Objective 1	Objective 2	Objective 3	Objective 4	Objective 5
Supplier	3	0	3	1	0
DNOs	5	0	4	2	0
IDNO	0	0	0	0	0
Total	8	0	7	3	0

7.30 All respondents to this question considered that DCUSA General Objective one was better facilitated by this change. One respondent advised that it was applicable in the following situations where:

- customers are left with installations which are safe, so far as is reasonably practicable (as required by the Electricity Safety, Quality and Continuity Regulations (ESQCR));
- customers are not inconvenienced more than is necessary as a result of supply de-energisations; and
- that work is undertaken in the most efficient, co-ordinated and economic fashion – eliminating the need to send multiple parties to undertake a simple task.

7.31 Seven respondents considered that DCUSA General Objective three was better facilitated by this change. One respondent provided their rationale for why both General Objective 1 and General Objective three were better facilitated:

- *"As stated, a key driver for this proposal is the potential risk posed by loose or untightened meter tail connections, either at the meter position or the service termination. A process by which the DNO can access both positions to check connection integrity while working on the DNO asset will provide an efficient means of reducing any risk posed".*

7.32 Three respondents considered that General Objective four was better facilitated by this change but did not provide their rationale behind their decision.

7.33 The Working Group noted the responses. Please refer to Section 10 of this report for the Working Groups rationale on which Objectives are best facilitated by this CP.

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

7.34 Nine respondents were not aware of any wider industry developments that would impact upon this CP. One respondent highlighted that there had been initial discussions on the development of reciprocal reporting arrangements between DNOs and Suppliers/Meter Operators to mirror the 'MOCOPA Guidance for Service Termination Issue Reporting' process. This respondent saw merit to a procedure for the DNO reporting Supplier equipment issues such as under size meter tails, damaged meter terminals.

- 7.35 The Working Group considered that the report referred to is an asset condition report to the meter provider. This new communication stream has not been finalised but it may aid improvement in communications for this change in the future.

**Question 12: Do you have a preference on the date that DCP 253 is implemented into the DCUSA?**

- 7.36 Four respondents did not have a preference on the date that DCP 253 is implemented in to the DCUSA. The remaining respondents considered that the change should either be implemented in the next DCUSA release following Authority consent or as soon as practicable.
- 7.37 The Working Group noted that all respondents were in agreement with the implementation date of the next DCUSA release following Authority consent for this change.

**Question 13: Are there any alternative solutions or matters that should be considered by the Working Group?**

- 7.38 Six respondents did not have any alternative solutions or matters to be considered by the Working Group. Two respondents considered that this change is in the interest of parties. One respondent re-highlighted their comments responded to by the Working Group at question ten. The remaining respondent asked the Working Group *“to consider a system of recompense for DNOs/IDNOs where they are called out to an issue which would normally fall under the MOP’s responsibilities”*.
- 7.39 The Working Group noted the responses. In regards to the system of recompense requested, the Working Group considered that it was outside the scope of this change. This issue would sit under the Distributor’s charging policy statement. It would be up to the distributor to decide whether they wished to contact the MOP to undertake the work.

## **8 ACTIONS UNDERTAKEN BASED ON FEEDBACK FROM THE CONSULTATION**

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- 8.1 Following the consultation, the Working Group reviewed the intent of the DCP 253 change which states *“to permit a DNO/IDNO, when it replaces its service cut-out, to retighten the meter tails and customer tails connecting into and out of a whole current meter and/or remake connections to meter terminals as necessary prior to re-energisation”* and confirmed

with the DCUSA Panel that the addition of temporarily moving a meter to facilitate the work being undertaken was within the spirit of the intent of this change.

8.2 The Working Group considered the responses to the key areas identified in the consultation and agreed the way forward as follows:

- **Tampering**

The Working Group agreed with consultation respondents that the likelihood of a Distributor's operative accessing high risk metering equipment such as a security block would be rare and the DNO/IDNO should notify the relevant Supplier when this occurs.

- **Impact on Smart Meter Alerts**

The group noted that there are a number of mandatory and configurable alerts which may be triggered as part of DNO work which the Suppliers need to consider when deciding what actions needs to be taken.

Whilst tamper alerts are in place on the meter, the process of isolating the electrical supply before accessing the meter will disable the alert so the activity will not send alerts during planned works. In considering the proposal to change the legal text, the group has highlighted that issues in terms of the Distributor activity affecting information that is provided from the meter in any form would need to be considered separately as part of party interaction to provide the benefits of smart metering. Any work conducted by any party on a smart meter installation will impact the information exchanged and the solution would need to be considered outside of this Working Group.

- **Competency**

The Working Group agreed that Distributors should cover the competency of their staff under their own training arrangements in line with the relevant DNO safety rules and the applicable MOCOPA requirements and noted that this view was in line with the majority of consultation respondents.

- **Liability**

The Working Group agreed that any liability would be limited to the work carried out by the Distributor and that the procedures under the MOCOPA would be followed.

8.3 The Working Group considered that in aligning with the MOCOPA, the work to replace the service cut-out, to retighten the meter tails and customer tails connecting into and out of a whole current meter and/or remake connections to meter terminals as necessary prior to re-

energisation provided for in the intent of this change is covered by MOCOPA Appendix 6 Clause 8a as set out below:

8a. *“If, upon assessing the risks that might arise from conducting works, the MOCOPA Operator considers that there is a higher than normal risk of disturbance of Distribution Business equipment (and terminations) or of Customer equipment (and terminations) then the MOCOPA® Operator must consider what preventative measures (e.g. cable clips) or reactive measures (retightening terminations) would be necessary to reduce risks arising from their intended works and leave open the option to not conduct the works until further advice is sought from the Distribution Business or the Customer as is required in the circumstances”.*

## 9 PROPOSED LEGAL TEXT

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9.1 The proposed legal text has been reviewed by the DCUSA Legal Advisor and acts as Attachment 2.

## 10 DCP 253 – WORKING GROUP CONCLUSIONS

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10.1 The Working Group reviewed each of the responses received to consultation one and concluded that all of the respondents understood the intent of DCP 253.

10.2 The Working Group agreed that all respondents were supportive of the principle of the CP.

10.3 The Working Group noted that the majority of respondents felt that specifically DCUSA General Objectives 1 and 3 were better facilitated by this change.

10.4 The Working Group agreed that the solution proposed by this change:

- reduces the potential for an elevated fire risk in relation to the IDNO/DNO replacement of the service cut out where the meter terminals are disturbed despite best endeavors highlighted by the RMISSE court case<sup>2</sup>;
- facilitates ESQCR Regulation 3 - General adequacy of electrical equipment<sup>3</sup>; and

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<sup>2</sup> The High Court decision dated 17<sup>th</sup> September 2012 on Case Nos: HT-10-95, HT-10-210, HT-10-??, HT-10-427 and HT-11-163 in respect of "Repair, Installation, Maintenance and Inspection of Supply Side Equipment", Neutral Citation Number: [2012] EWHC 2541 (TCC).

<sup>3</sup> Located on [http://www.legislation.gov.uk/uksi/2002/2665/pdfs/uksi\\_20022665\\_en.pdf](http://www.legislation.gov.uk/uksi/2002/2665/pdfs/uksi_20022665_en.pdf)

- facilitates ESQCR Regulation 4 - Duty of co-operation.

10.5 The Working Group concluded that the primary benefits of this CP is that:

- Due to the current arrangements which do not allow the Distributor to access the meter terminals to tighten them, this change will reduce the risk of an incident occurring and therefore improves the security and the safety of supply.
- As the Distributor will be able to resolve the call out within a shorter timeframe without co-ordinating with the MOP it will also improve the customer's experience.
- This change will also reduce the cost to serve the Customer as only one visit would be required.

## 11 EVALUATION AGAINST THE DCUSA OBJECTIVES

11.1 The Working Group considers that DCUSA General Objective 1 and 3 are better facilitated by DCP 253. The reasoning against the objectives is set out in the table below:

### **DCUSA General Objective One - The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks**

The ability of the DNO/IDNO parties to retighten and if necessary remake connections to whole current Metering System terminals consequent to DNO/IDNO works upon their service equipment enables a simpler, faster and safer procedural means to ensure the integrity of the electrical equipment on the customer's premises. It also better ensures the safety of the relevant customer than would be the case with either no tightening of meter terminals or alternative solutions leading to complex communication sequences and delays between DNO/IDNO works and Supply retightening of meter terminals.

### **DCUSA General Objective Three - The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences.**

There is no express Licence Obligation relevant to the DNO/IDNO working upon Metering Systems but the Working Group considers that there are constraints upon the duties under Electricity Act, the Electricity Safety, Quality and Continuity Regulations and the Electricity At Work Regulations if a more robust solution to works by the DNO/IDNO near whole current Metering Systems is not delivered. The existence of the RIMISSE Court

case judgement is to have the effect of making asset owners more wary over the condition of their equipment, the disturbance of their equipment, the likely altered condition of their equipment and the consequential outcomes if not efficiently and expeditiously addressed.

The Working Group believe that the ability of the DNO/IDNO parties to retighten and if necessary remake connections to whole current Metering System terminals consequent to DNO/IDNO works upon their service equipment enables the DNO to operate more safely when conducting its duties to maintain its connection under the Electricity Act (a prime Licence Obligation) and peripheral Electricity Safety, Quality and Continuity Regulations and the Electricity At Work Regulations as issued pursuant to the Health and Safety at Work Act. With the DNO/IDNO otherwise constrained from working upon whole current Metering System terminals, we consider that Suppliers and DNO/IDNO parties are and would be at elevated risk from untightened meter terminals following DNO/IDNO works in which it is in the interests of both Supply and Distribution licence holders to agree to progress this proposal.

## **12 IMPACT ON GREENHOUSE GAS OMISSIONS**

- 12.1 In accordance with DCUSA Clause 11.14.6, the Working Group assessed whether there would be a material impact on greenhouse gas emissions if DCP 253 were implemented. The Working Group did not identify any material impact on greenhouse gas emissions from the implementation of this CP.

## **13 IMPLEMENTATION**

- 13.1 Subject to Party approval and Authority consent, DCP 253 will be implemented in the next DCUSA release following Authority consent.

## **14 PANEL RECOMMENDATION**

- 14.1 The DCUSA Panel approved the DCP 253 Change Report on 23 June 2016. The timetable for the progression of the CP is set out below:

<b>Activity</b>	<b>Date</b>
Change Report approved by DCUSA Panel	23 June 2016

Change Report Issued for Voting	24 June 2016
Party Voting Closes	15 July 2016
Change Declaration Issued	19 July 2016
Authority Decision	23 August 2016
Implementation <sup>4</sup>	Next DCUSA Release Following Authority Consent

## 15 ATTACHMENTS:

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- Attachment 1 - DCP 253 Voting Form
- Attachment 2 - DCP 253 Proposed Legal Text
- Attachment 3 - DCP 253 Change Proposal
- Attachment 4 - DCP 253 Consultation Documents
- Attachment 5 - Energy Network Association (ENA) 'Reasons for DNOs to Access Meter Terminals' Paper

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<sup>4</sup> The next DCUSA release is scheduled for the 01 September 2016