Interventions Working Group Minutes

Meeting 13x

6 November 2017 at 13:00

Teleconference

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| Attendee | Representing |
| **IWG Member** | |
| Alison Scott [AS] | ENWL |
| David Brown [DB] | E.ON Energy |
| Paul Abreu [PA] | Energy Networks |
| Paul Morris [PM] | UK Power Networks |
| Kevin Woollard [KW] | British Gas |
| Kristian Pilling [KP] | SSE |
| Martin Murphy [MM] | Northern Powergrid |
| Michael Walls [MW] | Ofgem |
| Richard Hill [RH] | British Gas |
| **Secretariat** | |
| Lauren Nicholls [LN] Chair | ElectraLink |
| Graham Hall [GH] Secretariat | ElectraLink |

1. Welcomes and Apologies
   1. The Chair welcomed attendees to the Interventions Working Group meeting and noted that there were no apologies.
   2. The Working Group agreed to act in accordance with the terms set out in the DCUSA “Competition Law Dos and Don’ts”.
2. DCP 304 - Consultation Responses
   1. The IWG reviewed the DCP 304 Consultation provided by the Secretariat, which can be found as Attachment 1. The Consultation was issued on 29 August 2017 and eleven responses were received. The IWG discussed the Proposal and Consultation, noting the below:

Question 1 Responses

* 1. The Group noted that all eleven respondents understood the intent of DCP304.
  2. Question 2 Respondents
  3. In relation to E-ON’s response to Question 2 (Are you supportive of the principles of DCP304?), the Group agreed that the response was predicated by the fact that you can trace the Meter Operator (MOp) by looking at the seals for the agents’ IDs. It was noted that there could be issues with moving advanced / HH metering and a question was raised as to whether it should cover just whole current metering.

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| **ACTION 13x/01: KW to consider scope of the Change Proposal, and define whether it captures the larger metering equipment.** |

* 1. In relation to Scottish Power’s response to Question 2, the Group considered whether a higher level of competency would be required to work on looped neutrals, to which a member suggested that it is their company policy to train all of its operatives to work on looped neutrals. It was agreed that the MOp would be required to follow the existing requirements / accreditations.
  2. In relation to SSE’s response to Question 2, the Group agreed that the intention of the DCP was to enable minimal meter moves to occur, which would not require a notification to be issued to the Supplier. It was queried whether tamper alerts would be sent to the Supplier or whether there was a potential to affect the meters signals, to which it was agreed that no impacts were expected. The Group discussed whether guidance should be provided as to what constitutes minimal meter moves, which could be captured as part of the legal review. In terms of the priority services register, it was queried whether there is a requirement to check if a customer is on their priority services register if they may lose supply. DCUSA Clause 52H2 requires good industry practice to be adhered to, which would not be facilitated if the priority services register was not checked.
  3. In relation to Western Power’s response to Question 2, the Group reviewed each of the seven points and noted:

A) It was agreed for the definitions to be provided by the DCUSA Legal Advisors as part of the review process.

B) This change mentions isolators as you may want to de-energise the asset to fit an isolate.

C) In relation to the comment that ‘Including Isolators opens the industry to challenge from electrical contracting organisations that we are restricting, preventing, or distorting competition because we do not permit electricians to remove the cut-out fuse in order to undertake work on the customer’s installation’, the Group agreed that this change does not seek to restrict electrician, to which the group agreed.

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| **ACTION 13x/02: KW to check whether the facilitation of moving isolators should be included potentially as an alternate.** |

D) It was agreed that the work can only be conducted with the customers permission and that no rights to access would be provided by this change.

E) It was noted that the Third-Party Supplier would be required to send the information to the registered Supplier to ensure the relevant information is captured within the required interventions data flows. The basis of the CP may expand the remit of those Meter Operators who are authorised by multiple Suppliers, which could incentivise electricians. The precedent being set by this change was noted to be a concern. The original intent was to facilitate smart meter roll out.

F) It was agreed for the DCUSA Legal Advisor to provide a view on the mentioned clauses.

G) It was agreed that Western Power’s comments that ‘consideration should be given as to whether a section covering Third Party Electricity Supplier to Gas Supplier Relationships is required’ should be raised to the DCUSA Legal Advisor for consideration as it is a sensible suggestion.

Question 3 Responses

* 1. In relation to E.ON’s response to Question 3 (Do you believe this change will impact any other industry codes or documents, other than MOCoPA?), the Group agreed that there would not be an intention to notify the appointed Meter Operatives of work that has been conducted. It was agreed that the change is limited to whole current metering.
  2. Question 4 Responses
  3. The Group noted that none of the eleven respondents believed that DCP304 would have any negative environmental impact.

Question 5 Responses

* 1. In relation to E.ON’s response to Question 5 (Do you believe there will be any unintended consequences of the implementation of DCP 304?), the Group noted that change of measurement class has been covered, minimal movement would occur to ensure that the Wide Area Networks (WAN) and Home Area Networks (HAN) are still maintained.

Question 6 Responses

* 1. In relation to Electricity North West’s response to Question 6 (Are there any alternative solutions or matters that should be considered?), the Group reviewed the proposed drafting and the proposer queried the intent of the drafting, which could be clarified by the DCUSA Legal Advisor. The respondent suggested that the drafting was aiming to simplify the drafting. It was agreed for the drafting to be considered as part of the legal drafting.
  2. The Group considered Npower’s response to Question 6, and the proposer suggested that the information does flow through to the registered electricity Supplier as part of the legal drafting (DCUSA Section 52J.1). Section 2.5.1 of MRA Agreed Procedure 15 was noted.
  3. In relation to Western Power’s response to Question 6, the Group agreed that Category B and Category C processes would need to go via the registered Supplier in line with the gas safe first processes.

Question 7 Responses

* 1. In relation to E.ON’s response to Question 7 (Do you foresee any system changes being required to implement DCP 304?), the Group agreed that no changes would be required to the DTC.
  2. In relation to SSE’s response to Question 7, the respondent confirmed that they were happy with the discussions had during the meeting that addressed this comment.

Question 8 Responses

* 1. In relation to Question 8 (The proposed implementation date is the first standard release following Authority consent, which is anticipated to be June 2018, do you agree with this?) the Group noted that ten respondents agreed with the proposed implementation, with one respondent stating that the date does not at present appear feasible.

Question 9 Responses

* 1. In relation to Question 9 (Do you agree that DCP 304 better facilitates the DCUSA Objectives?) the Group noted that ten respondents agreed that DCP 304 better facilitates the DCUSA objectives, with one respondent stating that a fuller assessment needed to be carried out before a judgement could be given.

Question 10 Responses

* 1. In relation to Scottish Power’s response to Question 10 (Do you have any comments on the legal drafting?), the Group agreed that based on the earlier conversations there may have to be an alternate solution to capture whether an isolator should be included.
  2. In relation to UK Power Network’s response to Question 10, it was agreed for the definition to be passed on for legal review.

1. DCP 304 Work Plan
   1. The Group agreed the timetable for advancing DCP 304, noting that the proposer will implement changes to the legal text in light of the consultation responses.
2. DCP 302 Draft Change Report
   1. The IWG reviewed the revised DCP 302 (Moving Made Safe Instances To Cat B) Change Report provided by the Secretariat, which can be found as Attachment 3. Members reviewed the changes, and made the following comments:

Background of DCP 302

* 1. The Group agreed that Section 3.2 should be amended to change the statement *“The A07 incident category (exposed live / neutral conductors) accounts for circa 70% of all Category A incidents which are mostly minor (including missing or broken covers or exposed connection access points) and have not prevented the meter from being changed.”* Members agreed that reference to minor incidents could be removed and agreed upon the following wording. *“The A07 incident category (exposed live / neutral conductors) accounts for circa 70% of all Category A incidents which are interventions that have been made safe by the operator and have not prevented the meter from being changed.”*

Amendments to Section 4, DCP Consultation

* 1. The Group agreed that in two instances the term ‘situations made safer’ should be changed to ‘situations made safe’.
  2. The Group noted that more information should be added to Section 4.13 to describe the details of the relevant response to Question 5 (Do you believe there will be any unintended consequences of the implementation of DCP 302?). The response noted that, “a risk of ‘made safe’ installations dropping off the radar, when entry to property proves difficult, is possible. To mitigate this risk, DNO’s will need to have strong controls around management of outstanding Category B notifications requiring remedial work. Ensuring that temporary shrouds over DNO service equipment are removed and service equipment repaired needs to take priority. Customer notification processes to ensure timely access shall also feature as part of the strict internal controls that should be implemented in parallel with this change”. The Group noted that priority Category B codes could not be inserted within DCUSA but could form part of a parties’ internal processes.
  3. The Group agreed that Section 4.14 should be expanded to explain the triage approach that could be taken in relation to Category A situations made safe as an interim solution, which could include:
* The helpdesk operators asking a set of questions to ensure the situation should be reported as a Category A situation.
* The operator phoning its supervisor.
* Providing pictures.
  1. The Group agreed that more information should be added to Section 4.16 to describe the details of a response to Question 6 (Are there any alternative solutions or matters that should be considered?). The response queried whether DCUSA contains adequate provisions to ensure that a situation will not arise where a customer is off supply for longer than necessary due to re-categorisation from Category A to Category B. The Group agreed that a Meter Operative would never leave a customer off supply and categorise it as a Category B situation.
  2. The Group agreed that extra detail could be added to Section 4.17 to describe the details of a response to Question 6. The response stated that the principle driver for this Change Proposal was the high level of misreporting of Category A defects by Supplier’s Agents. The Group agreed that this was not the case, with this opinion confirmed within the consultation document and Change Proposal form.

Impacts and Considerations

* 1. The Group agreed that the change would have a positive impact on consumers, and thus agreed to amend Section 6.3 to state that DCP 302 would move emergency attendance to a planned attendance, which Members expected would improve the consumer journey and experience.

Implementation

* 1. The Chair noted that the implementation date of June 2018 would remain as stated, with the proposer accepting that the date may be pushed back to November 2018 if an MRA change is not advanced within the original timescale.

Legal Text

* 1. The proposer agreed to make some amendments to the legal text based on consultation responses. The legal text has been issued for legal review.

1. DCP 302 Work Plan
   1. The Group agreed the timetable for advancing DCP 302, noting that the proposed implementation date will be June 2018, dependant on an MRA change progressing in advance.

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| **ACTION 13x/03: Proposer to raise a relevant MRA CP in line with advancement of DCP302** |

1. Any Other Business
   1. The Chair queried whether the members had any other business to raise. There were no further items of business and the Chair closed the meeting.
2. Next Meeting Date
   1. The next IWG meeting will be held on Monday 14 December 2017.
3. Attachments
   * + - Attachment 1 – DCP 304 Consultation Responses
       - Attachment 2 – DCP 304 Work Plan
       - Attachment 3 – DCP 302 Draft Change Report v0.2