

Interventions Working Group Minutes

Meeting 13

16 October 2017 at 10:00

ElectraLink's Office, 2-3 Golden Square, London, W1F 9HR.

Attendee	Representing
IWG Member	
Alison Scott [AS]	ENWL
David Brown [Dbr]	E.ON Energy
David Brogden [DB]	SSE
Dave Wright [DW]	Npower
Ian Dobson [ID]	EDF 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
Richard Hill [RH]	British Gas
Secretariat	
Lauren Nicholls [LN] Chair	ElectraLink
Graham Hall [GH] Secretariat	ElectraLink

1. Welcomes and Apologies

- 1.1 The Chair welcomed attendees to the Interventions Working Group meeting and noted that there were no apologies.
- 1.2 The Working Group agreed to act in accordance with the terms set out in the DCUSA "Competition Law Dos and Don'ts".

2. Minutes

- 2.1 The Group approved the minutes of the last meeting, held on 14 August 2017, as an accurate record subject to minor amendments to sections 5.2 and 8.1.

3. Outstanding Actions

- 3.1 GH walked through the open actions. The updates on all actions are provided within Attachment 1.

4. Operational, Safety and Reporting Issues

- 4.1 The Chair asked members to share any operational, safety and reporting issues.

Supplier / DNO Differentiation

- 4.2 AS noted that in some instances customers do not see the difference between a Supplier and a DNO (Distribution Network Operator). Customers need to know who their Suppliers are working with, because customers have an expectation that their Suppliers will be the ones who attend their property when they report a fault. This is leading to confusion, because when a Supplier call centre representative informs a customer that a 'colleague' will attend on site, the customers are not trusting that the DNO is legitimate. Members noted that Suppliers could instruct call centre staff to notify customers as to who will attend on site in order to eliminate any confusion.

ACTION 13/01: Write to Suppliers to ask their installers not to call in defects that they have installed.

General Data Protection Regulation

- 4.3 DW queried whether it will still be legal for installers to transfer photos of meters once the new General Data Protection Regulations (GDPR) come into force. A member noted that in most instances the photo would only be a picture of a cut-out. DW highlighted that in some instances more than just the cut-out would be photographed, and that an encryption between the sender and receiver should alleviate any problems. Members noted that there are several potential methods to consider, such as a dedicated email address to send photos to, or using *whatsapp*. The Chair noted that a legal review was currently ongoing.

Category B classifications

- 4.4 DB noted that some jobs are being incorrectly classified as Category B, which could potentially result in responses not being met. Members noted that misreporting must be a factor if the number of incorrect classifications was accurate. DB noted that incorrect classifications were not limited to specific areas, however two Suppliers are giving incorrect classifications more often than others. DB noted that issues arising from incorrect classifications include having to make an appointment with the customer and prioritising jobs over others. DB noted that safety issues should be Category A jobs, and noted that Members could write to Suppliers to ask their installers not to call in defects that they have

installed themselves. Members noted that Category B jobs are ones that have prevented an installation, whereas in these instances the meter has already been installed.

5. Smart Meter Installs

- 5.1 The Chair provided an update regarding the monthly and cumulative smart meter installs for September 2017, which highlighted that 239,622 smart meters were installed in the reporting month, with the total cumulative number from January 2012 now standing at 5,920,963.
- 5.2 Members noted the figures.

6. DCP 297 Change Report

- 6.1 The IWG reviewed the revised DCP 297 Change Report provided by the Secretariat, which can be found as Attachment 2. Members reviewed the changes, and made the following comments:

Amendment to Executive Summary, Section 1.4

- 6.2 Members agreed that Section 1.4 should refer to 'the proposer' and not 'we' in relation to the following: *(The original legal drafting of the network SLA arrangements under DCP 153 only released the DNO's from their obligations where the aggregate forecasts of smart meter roll out exceeded an agreed percentage and was not linked to the actual number of interventions reported. The proposer of DCP 297 believes this is reasonable as suppliers have some control over the accuracy of their forecasts but have no control of the actual number of interventions reported as this can be dependent on a number of factors outside of their control i.e. age of network, customer damage etc).* Members noted that there was not universal support for this, and thus the terminology should reflect this view.

Amendment to Executive Summary, Section 1.5

- 6.3 Members agreed that the Section 1.5 should be amended from 'customers' to 'customers and / or Suppliers' in relation to the following: *(All customers and / or Suppliers who require a network intervention should have a reasonable expectation of when the DNO will attend and the DNOs have been provided funding to deliver this. This change therefore seeks to remove the cap on the percentage of actual interventions that benefit from the SLA by linking the release clause to the accuracy of supplier forecasts).* Members noted that in some instances customers cannot be contacted to allow access to a property within the time scales involved, and as such the statement should reflect this.

Amendment to Section 3.4

- 6.4 In Section 3.4, members noted that the reporting on the actual number of interventions carried out by DNOs has been in place since 2015 and not for 18 months as originally stated.

Amendment to Section 3.5

- 6.5 Members noted that section 3.5 should be amended from 'customers' to 'Suppliers', following the same guidelines as stated in section 1.5.

Removal of table in Section 4.6

- 6.6 Members highlighted that the proposers table of responses in section 4.6 should be removed. Members queried if it was standard procedure for the proposer to respond in such a way. KW noted that more detail was required in responding to the consultation responses, and the table was intended to better reflect the exchanges of opinion. A member noted that the table provided clarity to some participants objections, however other members noted that whilst the effort was appreciated, the table could allow the change report to be skewed in favour of the proposer. Members highlighted that the proposers comment regarding 'alleged misreporting' was inaccurate, however KW noted that the comment was valid. A member noted that DNOs had rejected the proposal in the consultation but the report was giving the impression that Suppliers were supportive of it in equal measure. Based upon the wishes of a majority of Members KW agreed that the table would be removed.
- 6.7 Members noted that another Change Proposal would potentially have to be raised in response to DCP297 as elements of the Change Proposal would be opposed. A member proposed attempting to bridge the gap between the opposing viewpoints via a new Change Proposal, with a member noting that an alternative Change Proposal would be raised from within the DNO community if DCP297 was approved. A member noted that this would be looked at internally with a view to looking at the potential for an alternative.

Amendment to Question 3 of the DCP297 Consultation

- 6.8 The Chair noted that the section relating to Question 3: *(The proposer has suggested the DNOs should only be released from their obligations to meet the service level where Supplier's volumes of attempted smart meter installations exceeds 110% of their forecast. Do you agree that 110% is a reasonable limit for DNO's to be released from their obligation?)* had been amended to show the updated legal text. A member queried why this legal text had amended the 110% threshold to 102%. KW noted that Suppliers forecasting beyond 100 per cent is a reality at present, and was based on the suggestion from Ofgem in its change response letter to DCP195A.

Amendment to Question 9 of the DCP297 Consultation

- 6.9 Members queried if an amendment to the section relating to Question 9: *(What do you believe is a reasonable intervention rate to be included within the SLA, based on the intervention rates that have been witnessed?)* could contain reference to the level of disagreement within the IWG over the alleged misreporting received by DNOs. This request was granted and the section was amended.

Implementation

- 6.10 The Chair noted that the implementation date of November 2018 would remain as stated, with the change proposal being introduced to the DCUSA panel in November 2017 followed by Authority decision in January or February 2018.

7. DCP 297 Work Plan

- 7.1 The Group agreed the timetable for advancing DCP 297, noting that the proposed implementation date will be 2 November 2018.

8. DCP 302 Consultation Responses

- 8.1 The IWG reviewed the DCP 302 Draft Consultation provided by the Secretariat, which can be found as Attachment 3. The Consultation was issued on 6 September 2017 and eleven responses were received. The IWG discussed the Proposal and Consultation, noting the below:

Question 2 responses

- 8.2 In relation to the British Gas response to Question 2 'Are you supportive of the principles of DCP302?' the Group noted that the proposal was raised in response to some Supplier's making situations safe and leaving site where a Category A intervention has been raised rather than remaining on site to wait for a DNO to attend. A number of circumstances were noted whereby the operative would stay on site i.e. where burning can be smelt. It was noted that not all DNOs supported the approach of making situations safe as they would prefer to send an operative to site to undertake the necessary work. This was counter to the majority view; however, supported the wider rationale that the site should be made safe as soon as possible.
- 8.3 The Supplier members noted that their internal processes would need to be reviewed to ensure that the quality of the products being used to 'make safe' could last the full duration i.e. 40 days and further still for exceptional circumstances whereby the DNO cannot gain access to the asset. It was noted that by making Category A situations safe, this would move the risk to Suppliers rather than DNOs.
- 8.4 The Group concluded that the concerns raised were valid and would need to be considered during the progression of this change as well as the minimum specification of the materials to use to make an installation safe.
- 8.5 In relation to the response of SSEN to Question 2, the Group noted that the process introduced by SSEN to challenge Category A interventions had reduced their intervention rates significantly and suggested that an additional step could be inserted whereby a Meter Operative is required to call the DNO from site to notify the business of a Category A situation made safe. It was further suggested that some Category A codes would need to be excluded from the list of codes that can be made safe in line with the drafting of this change. The Group agreed that should DCP 302 be approved, a subsequent review of the guidance document would need to occur to ensure the documents are aligned.
- 8.6 In relation to the response of Western Power to Question 2, the Group agreed that the change should reflect that the situation has been made safer rather than made safe. It was noted that there are some situations that can be made safe and that the measures inserted are sometimes left by the DNO as they are deemed to be satisfactory. In relation to point B, the Group suggested that the occupiers of the premises should be included as a factor within the risk assessment undertaken when the operative attends site. It was agreed that a recognised process for making a site safe would need to be introduced to ensure a degree of consistency.
- 8.7 The members agreed that a consistency approach across all DNOs would be required, specifically in terms of the materials that can be used to make a situation safer.
- 8.8 In response to point C of Western Power's response to Question 2: *(The hazard is present on DNO/IDNO equipment and has been classed as a Category A situation, which is defined in DCUSA as a*

situation where the Company's equipment does, or is likely to, pose a danger, including danger of death or of injury to persons and/or danger of damage to or destruction of property. In WPD's opinion both the customer and the HSE would expect a responsible asset owner to deal promptly with such an issue. It is unlikely that a delay of up to 40 working days (8 calendar weeks) would be perceived to be a prompt or reasonable response) the Group highlighted that the counter view would be that the equipment had been in situ for a number of year prior to the install and had been made safer by the MOp on site and thus a further 40-day wait would not make a significant difference. The members present agreed that a collective approach to making a situation safer would be required otherwise Meter Operatives would need to stay on site. By staying on site, it was noted that by staying on site there will be a knock-on effect to the remaining installs due to be completed that day, which would have a larger impact on the Programme's delivery date.

- 8.9 In response to point D of Western Power's response to Question 2: *(In WPD's experience it is generally easier to gain access to customer's premises on the day the Category A issue is identified rather than at a later date. In the case of Category B situations, WPD expends a great deal of time and effort trying to contact customers by telephone, by writing multiple letters, and by cold calling at premises, and sometimes is still unable to gain access to customer's premises. WPD is concerned that the Change Proposal may result in a dangerous situation existing in a customer's premises for a protracted period of time)*, the Group agreed that it is easier to gain access to a customer's premises whilst the MOp is still on site or on the same day.
- 8.10 In relation to the comments raised regarding liabilities and indemnities, it was agreed that further legal advice would need to be sought. On the contrary, it was noted that the proposed approach would not work in situations where a Meter Reader has reported the intervention as they cannot be expected to stay on site. It was suggested that the service termination guidance document could be updated to reflect that in some circumstances, the MOp would be choosing to leave site at their own risk as it is not advised by the DNO.
- 8.11 In response to point F of Western Power's response to Question 2: *(DCUSA Clause 30.5A.4 allows DNOs to defer resolution of a Category A situation within Category B timescales once the situation had been made safe. For this to apply the DNO would have had to have visited the premises (thereby demonstrating a prompt response to both the customer and HSE) and verified that any making safe was to their satisfaction such that they would accept any consequential liability)* the Group noted the comment raised and queried whether the approach taken by WPD was driven from a safety or access perspective.
- 8.12 The Group considered the comments in point G of Western Power's response to Question 2: *(The principle driver for this change proposal is the high level of misreporting of Category A (and B) situations by the Supplier's Agents. For example, in our East Midlands licence area around 1 in 3 Category A situations are misreports. Analysis of the Category A & B misreports received in our East Midlands area over a one year period revealed that there was no defect present in 70% of the cases)* and noted that there is a mechanism to charge Suppliers for misreports at present. However, this may not result in Suppliers being incentivised to not misreport.

- 8.13 The Group noted that the principle driver of the Change Proposal was to alleviate some of the issues the industry was facing, as well as to manage some of the processes that have become common practice.

Question 3 responses

- 8.14 In relation to the response of Western Power to Question 3, 'Do you agree that this change should be progressed in parallel with an MRA change to amend an electricity Data Flow?', the Group agreed that the types of work that would have been made safer would need to be identified within the guidance document to ensure a retrograde step does not occur. The option to use notes was highlighted as an approach to minimise WPDs concerns.

Question 5 responses

- 8.15 In relation to the Northern Powergrid response to Question 5, 'Do you believe there will be any unintended consequences of the implementation of DCP 302?', the Group noted that priority Category B codes could not be inserted within DCUSA but could form part of a parties' internal processes.
- 8.16 In relation to the SSEN response to Question 5, the Group agreed that this risk could be mitigated by due process being followed and standardisation being introduced. In addition, it was suggested that a triage approach could also be taken in relation to Category A situations made safer as an interim solution.

Question 6 responses

- 8.17 In relation to the response of ESPE to Question 6, 'Are there any alternative solutions or matters that should be considered?', the Group agreed that a Meter Operative (MOp) would never leave a customer off supply and categorise it as a Category B situation.
- 8.18 In relation to the response of Western Power to Question 6, the Group agreed that the principle of the CP was not to address the high level of misreporting of Category A defects. This is confirmed within the consultation document and CP form.

9. DCP 302 Work Plan

- 9.1 The Group agreed the timetable for advancing DCP 302, noting that the proposer will implement changes to the legal text in light of the consultation responses.

10. DCP 304 Consultation Responses

- 10.1 The Group agreed that DCP 304 could be discussed at an additional meeting via teleconference at a date to be confirmed.

11. DCP 304 Work Plan

- 11.1 The Group agreed that DCP 304 could be discussed at an additional meeting via teleconference at a date to be confirmed.

12. Next Steps

- 12.1 The Chair confirmed the below next steps:

- DCP 297 will be presented at the DCUSA Panel in November for agreement to progress.
- The proposer of DCP 302 will implement changes to the legal text in light of the consultation responses.
- DCP 304 to be discussed via teleconference. A Doodle poll¹ will be sent out to arrange a convenient date for members.

13. Any Other Business

- 13.1 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.

14. Next Meeting Date

- 14.1 The next IWG meeting will be a teleconference with date to be decided. The next scheduled IWG will be held on Monday 14 December 2017.

15. Attachments

- Attachment 1 – Outstanding Actions
- Attachment 2 – DCP 297 Change Report v0.3
- Attachment 3 – DCP 302 Consultation Responses

¹ The Doodle poll with options for dates for the DCP 304 teleconference meeting can be found at <https://doodle.com/poll/cunq63i37n6f5pn5>