

DCUSA Change Report		At what stage is this document in the process?	
<h2>DCP 302</h2> <h3>Moving Made Safe Instances to Cat B</h3> <p>Date raised: <i>16 June 2017</i></p> <p>Status of Change: <i>Urgent</i></p>		01 – Change Proposal	
		02 – Consultation	
		03 – Change Report	
		04 – Change Declaration	
<p><b>Purpose of Change Proposal:</b></p> <p>To change the Category definition(s) to allow Category A incidents that have been made safe by the meter operator to be reclassified and reported as Category B.</p>			
	<p>This document is issued in accordance with Clause 11.20 of the DCUSA, and details DCP 302 – Moving Made Safe Instances To Cat B.</p> <p>Parties are invited to consider the proposed amendment (Attachment 1) and submit their votes using the Voting form (Attachment 2) to <a href="mailto:dcusa@electralink.co.uk">dcusa@electralink.co.uk</a> by <i>day/month/year</i></p> <p>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.</p> <p>If you have any questions about this paper or the DCUSA Change Process, please contact the DCUSA by email to <a href="mailto:dcusa@electralink.co.uk">dcusa@electralink.co.uk</a> or telephone 020 7432 3011.</p>		
		<p>Parties Impacted:</p> <p>DNOs, IDNOs and Suppliers</p>	
		<p>Impacted Clauses:</p> <p>Section 1A – Definitions / Clauses under 30.5</p>	

**Guidance On The Use Of This Template:**

*Code Administrators will complete this Change Report – which follows naturally on from the Working Group Report and is designed to allow Panel to adjust any of the consultation items after considering the WG Report.*

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4	<b>Solution</b>	4	Proposer: <b>Paul Morris</b>
5	<b>Relevant Objectives</b>	7	 <b>paul.morris@ukpower networks.co.uk</b>
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7	<b>Implementation</b>	8	Other: <b>Insert name</b>
8	<b>Legal Text</b>	9	 <b>email address.</b>
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<b>Timetable</b>			 <b>email address.</b>
The timetable for the progression of the CP is as follows:			 <b>telephone</b>
<b>Change Proposal timetable</b>			Other: <b>Insert name</b>
Activity	Date		 <b>email address.</b>
Initial Assessment Report Approved by Panel	21 June 2017		 <b>telephone</b>
Consultation Issued to Industry Participants	19 September 2017		Other: <b>Insert name</b>
Change Report Approved by Panel	dd month year		 <b>email address.</b>
Change Report issued for Voting	dd month year		 <b>telephone</b>
Party Voting Closes	dd month year		
Change Declaration Issued to Parties	dd month year		
[Change Declaration Issued to Authority]	dd month year		
[Authority Decision]	dd month year		
Implementation	dd month year		

## 1 Executive Summary

### What

- 1.1 The Distribution Connection and Use of System Agreement (DCUSA) is a multi-party contract between electricity Distributors and electricity Suppliers and large Generators. Parties to the DCUSA can raise Change Proposals (CPs) to amend the Agreement with the consent of other Parties and (where applicable) the Authority.

### Why

- 1.2 DCP 302 seeks to change the Category definition(s) to allow Category A incidents that have been made safe by the meter operator to be reclassified and reported as Category B. Currently the DNO parties are requested to attend Category A issues with emergency response resources where the issue has been made safe by the meter operator. This currently diverts resources unnecessarily from GS1 safety issues / customers off supply. The intent of the original proposal for a 3 hour SLA response was linked to meter operators staying on site.

### How

- 1.3 Modifying the Category B definition to include Category A incidents that have been made safe by the meter operator would enable a Category B code to be developed to capture these incidents and respond to them with appropriate priority.

## 2 Governance

### Justification for Part 1 Matter

- 2.1 DCP 302 is classified as a Part 1 matter and therefore will go to the Authority for determination after the voting process has completed. This is a Part 1 matter because it relates to the Safety and Security of the distribution network.

## Requested Next Steps

- 2.2 The Panel considered that the [Working Group/Proposer] has carried out the level of analysis required to enable Parties to understand the impact of the proposed amendment and to vote on DCP 302.
- 2.3 The DCUSA Panel recommends that this CP:
- Be treated as a Part 1 matter
  - Be treated as an Urgent Change
  - Proceed to Working Group
- 2.4 This issue is diverting emergency resource from urgent safety related GS1 calls and customers off supply and needs to be addressed to enable appropriate prioritisation and resourcing.

## 3 Why Change?

### Background of DCP 302

- 3.1 As we prepare for the full smart rollout, DNOs have seen higher than forecast volumes for the Category A incidents requiring emergency response. This issue has been debated and efforts made reviewing the Category A code guidance have not been effective in providing an appropriate solution.
- 3.2 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.
- 3.3 The Category A SLA was put in place to enable a fast response where Meter Operators highlighted safety issues that required the meter operator to stay on site. The process and guidance has subsequently developed to enable meter operators to make safe, providing appropriate risk assessed mitigation to enable a planned follow up.
- 3.4 The SLA and associated legal text definition requires updating to reflect the appropriate revised prioritisation levels and thus avoiding the need for DNO emergency response resources being diverted from appropriately classified GS1 emergencies and customers off supply.

## 4 Solution

### DCP 302 Assessment

- 4.1 The DCUSA Panel recommended that the CP be progressed to the Change Report Phase.

## 4.2 *The Business Justification of the CP, and the recommendation of the Working Group*

### **DCP 302 Consultation**

4.3 The DCP 302 consultation was issued on 19 September 2017 and there were eleven responses received.

4.4 [A summary of the responses received, and the Working Group's conclusions are set out below].  
[The full set of responses and the Working Group's comments are provided in Attachment 3].

#### **Question 1 - Do you understand the intent of the CP?**

4.5 The Working Group noted that all eleven respondents understood the intent of DCP302.

#### **Question 2 – Are you supportive of the principles of DCP 302? If not, why not?**

4.6 The Working Group noted that nine respondents were supportive of the principles of DCP 302, with two respondents giving comments for consideration

4.7 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.

4.8 The Working 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.

#### **Question 3 - Do you agree that this change should be progressed in parallel with an MRA change to amend an electricity Data Flow? If not, why not?**

4.9 The Working Group noted that Ten respondents agreed that this change should be progressed with MRA change to amend an electricity Data Flow. One respondent disagreed.

4.10 The Working 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 the respondents concerns.

#### **Question 4 - Do you agree that this change should be progressed in parallel amendments to the MOCOPA Service Termination Guidance Document? If not, why not?**

4.11 The Working Group noted that ten respondents agreed that this change should be progressed in parallel amendments to the MOCOPA Service Termination Guidance Document. One respondent disagreed.

**Question 5 - Do you believe there will be any unintended consequences of the implementation of DCP 302?**

- 4.12 The Working Group noted that six respondents stated that there will be no unintended consequences from the implementation of DCP 302, with five respondents giving comments for consideration.
- 4.13 In relation to the one response, the Working Group noted that priority Category B codes could not be inserted within DCUSA but could form part of a parties' internal processes.
- 4.14 In relation to another response, the Working 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 - Are there any alternative solutions or matters that should be considered? If yes, please describe these.**

- 4.15 The Working Group noted that four respondents gave alternative solutions or matters for consideration, with seven respondents offering no alternatives.
- 4.16 In relation to one of the responses, the Working Group agreed that a Meter Operative (MOp) would never leave a customer off supply and categorise it as a Category B situation.
- 4.17 In relation to another response, the Working 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.

**Question 7 - The proposed implementation date is the first standard release following Authority consent (which is anticipated to be June 2018), do you agree with this? If not, why not?**

- 4.18 The Working Group noted that six respondents stated that they agreed with the proposed implementation date, with five stating that the date was not viable at present.
- 4.19 The five respondents questioned whether DCP302 could be implemented prior to an MRA change becoming affective, with one respondent noting that if this was the case the implementation date would be at the end of 2018.

**Question 8 - Do you have any comments on the legal drafting?**

- 4.20 The Working Group noted that six respondents gave comments on the legal drafting for consideration, with five respondents making no comments.
- 4.21 One respondent recommended that Category B should include the caveat "and a suitable reporting Category B code has been made available".
- 4.22 *Another respondent recommended that Category B should include the addition of the line "or where a Category A Situation has been made safe **by the attending meter operator.**"*

4.23 Another respondent recommended that Category B include the caveat “and a suitable reporting Category B code has been made available”.

**Question 9 – Do you have any further comments?**

4.24 The Working Group noted that seven respondents had no further comments to make, with four respondents giving additional comments in support of the proposal for consideration.

**DCP 302 Impact Assessment**

4.25 Insert text here

**Working Group Conclusions**

4.26 The Working 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.

**5 Relevant Objectives**

**Assessment Against the DCUSA Objectives**

5.1 For a DCUSA Change Proposal to be approved it must be demonstrated that it better meets the DCUSA Objectives. There are five General DCUSA Objectives and five Charging Objectives. The full list of objectives is documented in the CP form provided as Attachment 1.

**Please Note:** *Charging Methodology Change Proposals should only be assessed against the DCUSA Charging Methodology Objectives and the General Change Proposals should be assessed on DCUSA General Objectives.*

*Only Change Proposals impacted by both Charging and General objectives are to be assessed on both General and Charging Objectives.*

5.2 The [Working Group/Proposer] considers that the following DCUSA Objectives are better facilitated by DCP 302.

Impact of the Change Proposal on the Relevant Objectives:	
Relevant Objective	Identified impact
General Objective One - The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Network	Positive

- 5.3 General Objective One is better facilitated by DCP 302 because the change will enable DNO's to resource intervention reports more efficiently avoiding clashes in responding to emergencies and improving emergency response and customer service.

## 6 Impacts & Other Considerations

- 6.1 None highlighted

### Does this Change Proposal impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

- 6.2 MRA

The issue has been discussed at the following groups;

- ENA STIG - Service Termination Issues Group
- SMOG - BEIS Smart Meter Operations Group
- DCUSA IWG – Interventions Working Group
- MOCOPA All Parties Working Group,

### Consumer Impacts

- 6.3 None

### Environmental Impacts

- 6.4 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 302 were implemented. The Working Group did not identify any material impact on greenhouse gas emissions from the implementation of this CP.

### Engagement with the Authority

- 6.5 Ofgem has been fully engaged throughout the development of DCP 302 as a member of the Working Group.

## 7 Implementation

- 7.1 The proposed implementation date for DCP 302 is June 2018.
- 7.2 *Include details about the implementation date and any pre implementation work required by parties and/or the administrator. The Working Group may require an implementation date lead time.*

## 8 Legal Text

- 8.1 The legal text for DCP 302 is provided as Attachment 1.
- 8.2 The legal text sets out the proposed change to the definition of Category B Situations.
- 8.3 The Working Group has considered the Legal Text and is satisfied that it meets the intent of the Solution, dependant on the proposer implementing agreed changes to the legal text in light of consultation responses.
- 8.4 *Reference the Attachment which has been reviewed by the DCUSA Legal Advisors*

## 9 Code Specific Matters

### Reference Documents

- 9.1 A Cat B code to report Cat A incidents made safe will be developed and agreed with the MOCOPA all parties working group and a subsequent MRA code change.
- 9.2 Appropriate made safe guidance / methodology to be developed and published via MOCOPA outside of this change proposal.

## 10 Recommendations

### Panel's Recommendation

- 10.1 The Panel approved this Change Report on dd/mm/yy. The Panel considered that the Working Group has carried out the level of analysis required to enable Parties to understand the impact of the proposed amendment and to vote on DCP 302.
- 10.2 The Panel have recommended that this report is issued for Voting and DCUSA Parties should consider whether they wish to submit views regarding this Change Proposal.

### Attachments

- Attachment 1 – DCP 302 Legal Text
- Attachment 2 – Voting Form
- Attachment 3 – DCP 302 Consultation Responses