

## Part A: Generic

DCUSA Change Proposal (DCP)		At what stage is this document in the process?
<h1>DCP 302:</h1> <h2>Moving Made Safe Instances To Cat B</h2> <p>Date raised: <i>16 June 2017</i></p> <p>Proposer Name: <i>Paul Morris</i></p> <p>Company Name: <i>UK Power Networks</i></p> <p>Company Category: <i>Distribution Network Operator</i></p>		<p><b>01 – Change Proposal</b></p> <p>02 – Consultation</p> <p>03 – Change Report</p> <p>04 – Change Declaration</p>
<p>Purpose of Change Proposal:</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>Governance:</p> <p>The Proposer recommends that this Change Proposal should be:</p> <ul style="list-style-type: none"> <li>• Treated as a Part 1 Matter</li> <li>• Treated as an Urgent Change</li> <li>• Proceed to a Working Group</li> </ul> <p>The Panel will consider the proposer’s recommendation and determine the appropriate route.</p>	
	<p>Impacted Parties:</p> <p>DNOs, IDNOs and Suppliers</p>	
	<p>Impacted Clauses: Section 1A - Definitions / Clauses under 30.5</p>	

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 Any questions?

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## Indicative Timeline

**The Secretariat recommends the following timetable:**

Initial Assessment Report	21 June 2017
Consultation Issued to Industry Participants	TBC
Change Report Approved by Panel	TBC
Change Report issued for Voting	TBC
Party Voting Closes	TBC
Change Declaration Issued to Authority	TBC
Authority Decision	TBC

## 1 Summary

### What?

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.

### Why?

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?

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 and Part 2 Matter

This is a Part 1 matter because it relates to the Safety and Security of the distribution network.

### Requested Next Steps

This Change Proposal should:

- Be treated as a Part 1 matter
- Be treated as an Urgent Change
- Proceed to Working Group

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?

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.

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.

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.

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.

## Part B: Code Specific Details

### 4 Solution and Legal Text

#### Legal Text

**Category A Situation** means a situation in which the Company's Electric Lines or Electrical Plant does (or is likely to) pose a danger, including danger of death of or injury to persons and/or danger of damage to or destruction of property.

**Category B Situation** means a situation in which the condition of the Company's Electric Lines or Electrical Plant prevents metering work from being carried out or prevents a meter from being exchanged ~~but where the situation is not a Category A Situation~~ or where a Category A Situation has been made safe.

#### Text Commentary

The revised legal text definition will enable development of a Cat B code which will cover Cat A incidents that have been appropriately made safe enabling the meter operator to leave site and the follow up DNO attendance to be reprioritised and planned.

### 5 Code Specific Matters

#### Reference Documents

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.

Appropriate made safe guidance / methodology to be developed and published via MOCOPA outside of this change proposal.

## 6 Relevant Objectives

DCUSA Charging Objectives	Identified impact
<input type="checkbox"/> 1 that compliance by each DNO Party with the Charging Methodologies facilitates the discharge by the DNO Party of the obligations imposed on it under the Act and by its Distribution Licence	None
<input type="checkbox"/> 2 that compliance by each DNO Party with the Charging Methodologies facilitates competition in the generation and supply of electricity and will not restrict, distort, or prevent competition in the transmission or distribution of electricity or in participation in the operation of an Interconnector (as defined in the Distribution Licences)	None
<input type="checkbox"/> 3 that compliance by each DNO Party with the Charging Methodologies results in charges which, so far as is reasonably practicable after taking account of implementation costs, reflect the costs incurred, or reasonably expected to be incurred, by the DNO Party in its Distribution Business	None
<input type="checkbox"/> 4 that, so far as is consistent with Clauses 3.2.1 to 3.2.3, the Charging Methodologies, so far as is reasonably practicable, properly take account of developments in each DNO Party's Distribution Business	None
<input type="checkbox"/> 5 that compliance by each DNO Party with the Charging Methodologies facilitates 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.	None
<input type="checkbox"/> 6 that compliance with the Charging Methodologies promotes efficiency in its own implementation and administration.	None
DCUSA General Objectives	Identified impact
<input checked="" type="checkbox"/> 1 The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks	Positive
<input type="checkbox"/> 2 The facilitation of effective competition in the generation and supply of electricity and (so far as is consistent therewith) the promotion of such competition in the sale, distribution and purchase of electricity	None
<input type="checkbox"/> 3 The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences	None
<input type="checkbox"/> 4 The promotion of efficiency in the implementation and administration of the DCUSA	None
<input type="checkbox"/> 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.	None

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.

## 7 Impacts & Other Considerations

None highlighted

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

No

### Does this Change Proposal Impact Other Codes?

- BSC
- CUSC
- Grid Code
- MRA
- SEC
- Other
- None

### Consideration of Wider Industry Impacts

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,

### Confidentiality

None

## 8 Implementation

The IWG will agree a works schedule to enable the efficient introduction of this change

### Proposed Implementation Date

Next release after approval

## 9 Recommendations

### Part C: Guidance Notes for Completing the Form

Ref	Section	Guidance
1	<b>Attachments</b>	Append any proposed legal text or supporting documentation in order to better support / explain the CP.
2	<b>Governance</b>	<p>A CP must be categorised as a Part 1 or Part 2 matter in accordance with Clause 10.4.7 of the DCUSA. All Part 1 matters require Authority Consent.</p> <p>Part 1 Matter</p> <p>A change Proposal is considered a Part 1 Matter if it satisfies one or more of the following criteria:</p> <p>a) it is likely to have a significant impact on the interests of electricity consumers;</p> <p>b) it is likely to have a significant impact on competition in one or more of:</p> <ul style="list-style-type: none"> <li>i. the generation of electricity;</li> <li>ii. the distribution of electricity;</li> <li>iii. the supply of electricity; and</li> <li>iv. any commercial activities connected with the generation, distribution or supply of electricity;</li> </ul> <p>c) it is likely to discriminate in its effects between one Party (or class of Parties) and another Party (or class of Parties);</p> <ul style="list-style-type: none"> <li>i. it is directly related to the safety or security of the Distribution Network; and</li> <li>ii. it concerns the governance or the change control arrangements applying to the DCUSA; and</li> <li>iii. it has been raised by the Authority or a DNO/IDNO Party pursuant to Clause 10.2.5, and/or the Authority has made one or more directions in relation to it in accordance with Clause 11.9A.</li> </ul> <p>Part 2 Matter</p> <p>A CP is considered a Part 2 Matter if it is proposing to change any actual or potential provisions of the DCUSA which does not satisfy one or more of the criteria set out above.</p>
3	<b>Related Change Proposals</b>	Indicate if the CP is related to or impacts any CP already in the DCUSA or other industry change process.

4	<b>Proposed Solution and Draft Legal Text</b>	<p>Outline the proposed solution for addressing the stated intent of the CP. The Change Proposal Intent will take precedence in the event of any inconsistency. A DCUSA Working Group may develop alternative solutions.</p> <p>The plain English description of the proposed solution should include the changes or additions to existing DCUSA Clauses (including Clause numbers).</p> <p>Insert proposed legal drafting (change marked against any existing DCUSA drafting) which enacts the intent of the solution. The legal text will be reviewed by the Working Group (if convened) and is likely to be subject to legal review as part of its progress through the DCUSA change process.</p>
5	<b>Proposed Implementation Date</b>	<p>The Change can be implemented in February, June, and November of each year or as an extraordinary release. For Charging Methodology CPs, select an implementation date which takes into consideration the minimum notice periods for publishing tariffs. These are:</p> <ul style="list-style-type: none"> <li>• 15 months, for DNOs acting within their Distribution Services Areas; or</li> <li>• 14 months, for IDNOs and DNOs acting outside their Distribution Services Area.</li> </ul> <p>Please select an implementation date that provides sufficient time for the Change to be incorporated into the appropriate charging model and the DCUSA in order to be reflected in future tariffs.</p> <p>Contact the DCUSA helpdesk for any further information on the releases <a href="mailto:dcusa@electralink.co.uk">dcusa@electralink.co.uk</a>.</p>
6	<b>Impacts &amp; Other Considerations</b>	<p>Indicate whether this Change Proposal will be impacted by or have an impact upon wider industry developments. If an impact is identified, explain why the benefit of the Change Proposal may outweigh the potential impact and indicate the likely duration of the Change.</p>
7	<b>Environmental Impact</b>	<p>Indicate whether it is likely that there would be a material impact on greenhouse gas emissions as a result of the proposed variation being made. Please see <a href="#">Ofgem Guidance</a>.</p>
8	<b>Confidentiality</b>	<p>Clearly indicate if any parts of this Change Proposal Form are to remain confidential to DCUSA Panel (and any subsequent DCUSA Working Group) and Ofgem</p>
9	<b>DCUSA General Objectives</b>	<p>Indicate which of the DCUSA Objectives will be better facilitated by the Change Proposal.</p>
10	<b>Detailed Rationale for DCUSA Objectives</b>	<p>Provide detailed supporting reasons and information (including any initial analysis that supports your views) to demonstrate why the CP will better facilitate each of the DCUSA Objectives identified.</p>

11	<b>DCUSA Charging Objectives</b>	Indicate which of the DCUSA Charging Objectives will be better facilitated by the Change Proposal.
12	<b>Defining 'Material' for Charging Methodology Changes</b>	In respect of proposals to vary one or more of the Charging Methodologies, such proposals shall be deemed to be "material" if they might reasonably be expected to have a significant impact on the tariffs calculated under one or more of the methodologies.