









DCUSA Consultation		At what stage is this document in the process?
<h1>DCP 302</h1> <p>DCP Title: Moving Made Safe Instances To Cat B</p> <p>29 August 2017</p>		01 – Change Proposal
		02 – Consultation
		03 – Change Report
		04 – Change Declaration
<p><b>Purpose of Change Proposal:</b></p> <p>DCUSA Change Proposal 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.</p> <p>This document is a Consultation issued to DCUSA Parties and any other interested Parties in accordance with Clause 11.14 of the DCUSA seeking industry views on DCP 302.</p>		
	<p>The Workgroup recommends that this Change Proposal should:</p> <ul style="list-style-type: none"> <li>• Proceed to Consultation</li> </ul>	
	<p>Parties are invited to consider the questions set in Section 10 and submit comments using the form attached as Attachment 1 to <a href="mailto:dcusa@electralink.co.uk">dcusa@electralink.co.uk</a> by <b>19 September 2017</b>.</p> <p>The Working Group will consider the consultation responses and determine the appropriate next steps for the progression of the DCUSA Change Proposal.</p>	
	Impacted Parties: DNOs, IDNOs, Suppliers	
	Impacted Clauses: 30.5.	

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Timetable		
The timetable for the progression of the Change Proposal (CP) is as follows:		
<b>Change Proposal timetable:</b>		
Activity	Date	
Initial Assessment Report Approved by Panel	21 June 2017	
First Consultation issued to Parties	29 August 2017	
Change Report issued to Panel	13 December 2017	
Change Report issued for Voting	22 December 2017	
Party Voting Ends	12 January 2018	
Change Declaration issued to Authority	16 January 2018	
Authority Decision	20 February 2018	

## 1. 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 CPs to amend the Agreement with the consent of other Parties and (where applicable) the Authority.

### Why

- 1.2 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.

## 2 Governance

### Justification for Part 1 Matter

- 2.1 The DCUSA Panel approved DCP 302 being progressed via the DUCSA Interventions Working Group to develop these changes, which held its first meeting in July 2017. DCP 302 was classed as a Part 1 matter by the Panel and therefore will go to the Authority for determination after the voting process has completed. The justification for this classification is that this change will impact customers.
- 2.2 The Working Group will use the feedback provided as part of this Consultation to further develop the change in readiness for the Change Report stage.

## 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. 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.

## 4 Code Specific Matters

### Background to The Creation of DNO SLAs

- 4.1 A Cat B code to report Cat A incidents made safe will be developed and agreed with the MOCOPA all parties working group and require a subsequent MRA code change. Appropriate made safe guidance / methodology to be developed and published via MOCOPA is outside of this Change Proposal; however, there is an interdependence.

## 5 Working Group Assessment

### DCP 302 Working Group Assessment

- 5.1 The DCUSA Panel agreed for DCP 297 to be considered by a Working Group, the Interventions Working Group, which consisted of independent representatives from DNO and Supplier parties and an Ofgem observer. An open invitation was extended to all DCUSA Parties and to all other interested parties to participate in this Working Group and this invitation remains open for any interested parties.
- 5.2 At its meeting in August 2017, the Interventions Working Group considered the implications of this change on MOCOPA and the MRA noting that DCP 302 is expected to be a consequential change. It was also noted that MOCOPA would include a definition for 'made safe', which following approval, could be incorporated into DCUSA. The members considered whether the word 'safe' in the proposal should be changed to 'safer', as Suppliers' liabilities will remain in place until the DNO attends the site. It was agreed that it is the responsibility of the Suppliers' Meter Operator to determine appropriate remedial action to make safe and manage the risk until the DNO arrives on site to resolve the defect.
- 5.3 In addition, it was considered that the new code comes into effect when the installer deems the site safe to leave, or when an installer has deemed the work to be safe to leave.
- 5.4 Finally, it was noted that this change will not impact the current practice adopted generally by meter operators who on most occasions leave site prior to the DNO attending. If an unsafe cut-

out is walked away from and something dangerous happens it is still the responsibility of the Suppliers' meter operator who found the defect to ensure that it is safe until such a time as a DNO arrives. This change seeks to amend DCUSA to align with current practices to make safe and to ensure that reporting reflects the reprioritisation.

## 6 Relevant Objectives

### Assessment against the DCUSA Objectives

- 6.1 The Working Group 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 Networks.	Positive

- 6.2 This change better facilitates this DCUSA Objectives as it enables the DNO to make improved decisions on efficiency of resource utilisation:

## 7 Impacts & Other Considerations

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

- 7.1 No, DCP 302 is not related to the SCR or other change proposals in other codes.

### Consumer Impacts

- 7.2 DCP 302 seeks to improve the ability of DNOs to maximise their efficiency when addressing interventions and ensuring that DNO resource is focussed on genuine emergency situations within the three-hour SLA timescale. This change will therefore impact Consumers with emergency situations as the DNO will be able to optimise their available emergency resources.

### Environmental Impacts

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

## Engagement with the Authority

- 7.4 Ofgem has been fully engaged throughout the development of DCP 302 as an observer of the Working Group.

## 8 Implementation

- 8.1 The proposed implementation date for DCP 302 is set to be the first standard DCUSA release following Authority Consent.

## 9 Legal Text

- 9.1 The legal text for DCP 302 has been provided as Attachment 2.

## 10 Consultation Questions

- 10.1 Responses, or any part thereof, can be provided in confidence. Parties are asked to clearly indicate any parts of a response that are to be treated confidentially.
- 10.2 The Working Group is seeking industry views on the following consultation questions:

Question Number	Question
1.	Do you understand the intent of DCP 302?
2.	Are you supportive of the principles of DCP 302? If not, why not?
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.	Do you agree that this change should be progressed in parallel amendments to the MOCOPA Service Termination Guidance Document? If not, why not?
5.	Do you believe there will be any unintended consequences of the implementation of DCP 302?
6.	Are there any alternative solutions or matters that should be considered? If yes, please describe these.

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?
8.	Do you have any comments on the legal drafting?
9.	Do you have any further comments?

10.3 Responses should be submitted using Attachment 1 to [dcusa@electralink.co.uk](mailto:dcusa@electralink.co.uk) no later than, 5 July 2017.

### Attachments

- Attachment 1 – Response Form
- Attachment 2 – DCP 302 Legal Text