



DCUSA Consultation

DCP 253 – Retightening and Remaking of Whole Current Metering System Terminal Connections

PURPOSE

- 1.1 The Distribution Connection and Use of System Agreement (DCUSA) is a multi-party contract between electricity Distributors, 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.
- 1.2 This document is a consultation issued to all DCUSA Parties, interested third parties, and the Authority in accordance with Clause 11.14 of the DCUSA seeking industry views on DCP 253 – ‘Retightening and Remaking of Whole Current Metering System Terminal Connections’.
- 1.3 Parties are invited to consider the options for proposed legal drafting set out in Attachment 2 to this document and submit comments using the response form provided as Attachment 1 to DCUSA@electralink.co.uk by **Friday, 19 February 2016**.

2 BACKGROUND TO THE DCP 253 CHANGE PROPOSAL

- 2.1 DCUSA Issue Form (DIF) 041 advised that the RMISSE¹ court case highlighted an elevated risk from untightened meter terminals following DNO/IDNO works. This led to a concern over liability due to acts or omissions which might lead to an increased fire risk at the service termination / metering position.
- 2.2 A Request For Information (RFI) was issued by the DCUSA Standing Issues Group (SIG) in October 2014 to ask Parties to provide their views on four solutions. All respondents preferred Option 1. DCP 253 was raised in November 2015 to propose Option 1.

3 DCP 253 ‘RETIGHTENING AND REMAKING OF WHOLE CURRENT METERING SYSTEM TERMINAL CONNECTIONS’

¹ The High Court decision dated 17th September 2012 on Case Nos: HT-10-95, HT-10-210, HT-10-??, HT-10-427 and HT-11-163 in respect of "Repair, Installation, Maintenance and Inspection of Supply Side Equipment", Neutral Citation Number: [2012] EWHC 2541 (TCC)

- 3.1 DCP 253 has been raised by UK Power Networks to permit a DNO/IDNO, when it replaces its service cut-out, to retighten the meter tails and customer tails connecting into and out of a whole current meter and/or remake connections to meter terminals as necessary prior to re-energisation.

4 WORKING GROUP ASSESSMENT

- 4.1 The DCUSA Panel has established a DCP 253 Working Group which consists of DNOs, Suppliers and a consultant who is also the Meter Operation Code of Practice (MOCOPA) Chair. An open invitation was extended to all DCUSA counterparties to attend this Working Group and this invitation remains open for any interested industry parties.
- 4.2 The DNO has a separate requirement to make safe and leave an installation in a condition that is fit for service. In an emergency situation where the meter tails or meter terminals are impacted it may not be practical to wait until a Meter Operator (MoP) can attend the site to undertake works or to leave the customer without service especially if the customer is on the Priority Service Register. The Working Group considered that this CP addresses outstanding issues around liability by covering any work undertaken on meter tails and meter terminals to make the installation safe in to a formal arrangement.
- 4.3 A Energy Network Association (ENA) paper containing reasons why a DNO may wish to access the terminal connection on metering equipment acts as Attachment 3.
- 4.4 Three areas were identified that require feedback from industry parties to aid the Working Group in drafting a holistic solution as set out below. In each area the safety implications have been considered.

Liability

- 4.5 The DNOs duty to indemnify the User for work undertaken by the Company is set out in DCUSA Section 2A Clause 25. This CP proposes to add Clause 25.23 (Attachment 2) to provide permission for the Company to access the terminals of the whole current Metering System to tighten those terminals. Under the Meter Operation Code of Practice (MOCOPA) a list of identification letters imprinted on Meter Operator's (MoPs) and Distributor's seals is maintained by a registration authority and shared with the relevant

parties. This seal potentially identifies the last Party to work on-site.

- 4.6 In the scenario where an installation has been destroyed as part of a fire, there may in some instances be no seal recovered to determine who was the last Party to work on the meter or service termination. To mitigate this scenario the DNO would be obliged to maintain records each time a meter is accessed and make them available on reasonable request, the Working Group agreed that this should be added to the legal text.
- 4.7 Any disturbed cable identifiers will be maintained in line with the MOCOPA methodology. The Working Group is interested on Parties views on the best practice for recording on-site work, potential liabilities from this work and if any of the recorded information should be shared as set out in Questions 4, 5 and 6.

Competency

- 4.8 It is proposed that DNOs should cover the competency of their staff under their own training arrangements in line with the relevant DNO safety rules and the applicable MOCOPA requirements. The Working Group is interested on Parties views as to whether this approach is sufficient or if there are any other training matters that the Working Group should take in to consideration at question 7.

Tampering

- 4.9 If a DNO's operative accesses high risk metering equipment such as a security block and a tamper proof arrangement and replaces it then it will impact the Theft Risk Assessment Service (TRAS) arrangements. The Working Group is interested in Parties views on how to best record this information so that it may be captured in a MOCOPA advice document and recommended as a consequential change for MOCOPA at question 8 and 9.

5 ASSESSMENT AGAINST THE DCUSA OBJECTIVES

- 5.1 The Working Group reviewed the CP against the DCUSA Objectives and agree that DCP 253 better facilitates DCUSA General Objectives 1 and 3 as set out in the table below.

DCUSA Objectives

Working Group View

<p>DCUSA General Objective One</p> <p>– The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks</p>	<p>The ability of the DNO/IDNO parties to retighten and if necessary remake connections to whole current Metering System terminals consequent to DNO/IDNO works upon their service equipment enables a simpler, faster and safer procedural means to ensure the integrity of the electrical equipment on the customer's premises. It also better ensures the safety of the relevant customer than would be the case with either no tightening of meter terminals or alternative solutions leading to complex communication sequences and delays between DNO/IDNO works and Supply retightening of meter terminals.</p>
<p>DCUSA General Objective Three - The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences.</p>	<p>There is no express Licence Obligation relevant to the DNO/IDNO working upon Metering Systems but we consider that there are constraints upon the duties under Electricity Act, the Electricity Safety, Quality and Continuity Regulations and the Electricity At Work Regulations if a more robust solution to works by the DNO/IDNO near whole current Metering Systems is not delivered. The existence of the RIMISSE Court case judgement is to have the effect of making asset owners more wary over the condition of their equipment, the disturbance of their equipment, the likely altered condition of their equipment and the consequential outcomes if not efficiently and expeditiously addressed.</p> <p>The Working Group believe that the ability of the DNO/IDNO parties to retighten and if necessary remake connections to whole current Metering System terminals consequent to DNO/IDNO works upon their service equipment enables the DNO to operate more safely when</p>

	<p>conducting its duties to maintain its connection under the Electricity Act (a prime Licence Obligation) and peripheral Electricity Safety, Quality and Continuity Regulations and the Electricity At Work Regulations as issued pursuant to the Health and Safety at Work Act. With the DNO/IDNO otherwise constrained from working upon whole current Metering System terminals, we consider that Suppliers and DNO/IDNO parties are and would be at elevated risk from untightened meter terminals following DNO/IDNO works in which it is in the interests of both Supply and Distribution licence holders to agree to progress this proposal.</p>
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6 LEGAL DRAFTING

6.1 The proposed legal drafting is included as Attachment 2.

7 IMPLEMENTATION

7.1 The proposed implementation date for DCP 253 is the next DCUSA release following DCUSA Party consent.

8 CONSULTATION

8.1 The Working Group is seeking views on the below questions:

1. Do you understand the intent of the DCP 253?
2. Are you supportive of the principles of the DCP 253?
3. Do you have any comments on the proposed legal text?
4. Should the DNO record access to the meter and where should this information be recorded?
5. What if any information should be shared and when should it be shared such as post incident investigation information?

6. What are the perceived liabilities?
7. The Working Group proposes that DNOs cover the competency of staff under their own training arrangements i.e. in line with the relevant DNO safety rules and the applicable MOCOPA requirements. Is this appropriate?
8. In the scenario where high risk metering is removed (security block) and a tamper proof arrangement is disturbed, then it could impact TRAS. Should a supplementary advice document be developed or should it be captured under MOCOPA?
9. How often would you expect to find high security TRAS arrangements on-site?
10. Which DCUSA General Objectives does the CP better facilitate? Please provide supporting comments.
 1. The development, maintenance and operation by each of the DNO Parties and IDNO Parties of an efficient, co-ordinated, and economical Distribution System.
 2. The facilitation of effective competition in the generation and supply of electricity and (so far as is consistent with that) the promotion of such competition in the sale, distribution and purchase of electricity.
 3. The efficient discharge by each of the DNO Parties and IDNO Parties of the obligations imposed upon them by their Distribution Licences.
 4. The promotion of efficiency in the implementation and administration of this Agreement and the arrangements under it.
 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.
11. Are you aware of any wider industry developments that may impact upon or be impacted by this CP?

12. Do you have a preference on the date that DCP 253 is implemented into the DCUSA?
 13. Are there any alternative solutions or matters that should be considered by the Working Group?
- 8.2 Responses should be submitted using Attachment 1 to DCUSA@electralink.co.uk no later than **Friday, 19 February 2016**.
- 8.3 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.

9 NEXT STEPS

- 9.1 Responses to the Consultation will be reviewed by the DCP 253 Working Group. The Working Group will then determine the progression route for the CP.
- 9.2 If you have any questions about this paper or the DCUSA Change Process please contact the DCUSA Help Desk by email to DCUSA@electralink.co.uk or telephone 020 7432 3017.

10 ATTACHMENTS

Attachment 1 – Response form

Attachment 2 – Proposed Legal Text

Attachment 3 - Reasons for DNOs to Access Meter Terminals

Attachment 4 – DCP 253 Change Proposal