

Meeting Session	Isolations for Safe Working – Working Group
Paper Reference	ISW 20191021 05
Action	For Information

## Relevant Regulation and Legislation

This paper sets out the regulation and legislation that is relevant to the de-energisation of electricity meters in the UK.

The purpose is to understand the restriction on electricity isolation and the parties responsible for providing the permission for, and the carrying out of, the required works.

Where possible this document states the Act and the section number, provides direct quotes where required and give the authors opinion (in red) where appropriate.

### Regulation and Legislation:

#### Electricity, Safety, Quality and Continuity Regulations 2002: Part VII Section 25

<http://www.legislation.gov.uk/ukxi/2002/2665/contents/made>

- ***‘Connections to installations or to other networks***
- *(1) No person shall make or alter a connection from a distributor’s network to a consumer’s installation, a street electrical fixture or to another distributor’s network without that distributor’s consent, unless such consent has been unreasonably withheld.*
- *(2) A distributor shall not give his consent to the making or altering of the connection referred to in paragraph (1), where he has reasonable grounds for believing that—*
  - *(a) the consumer’s installation, street electrical fixture or other distributor’s network fails to comply with British Standard Requirements or these Regulations; or*
  - *(b) the connection itself will not be so constructed, installed, protected and used or arranged for use, so as to prevent as far as is reasonably practicable, danger or interruption of supply.*
- *(3) Any dispute between a person to whom paragraph (1) refers and the distributor, arising from delay in giving or refusal to give the consent required by paragraph (1) by virtue of the provisions of paragraph (2), which cannot be resolved between them may be referred by either of them to the Secretary of State who shall appoint a suitably qualified person to determine the dispute and to order as he thinks fit whether the costs (or any part of them) associated with the determination should be borne by one or other of the parties.*

- *(4) Following the determination by the person appointed by the Secretary of State, the distributor shall grant or withhold the consent required in paragraph (1) as appropriate, subject to any conditions which the person appointed by the Secretary of State may stipulate in his determination.'*
- The DNO can only approve or withhold permission for works on the connection from their network to the consumers premises (the mains/service cable and the cut out)
  - However, the DNO cannot give their consent for alteration of the connection where they have reasonable grounds to believe there will be interruption to supply.

## Electricity (Standards of Performance) Regulations:

- **Section 3 – Paragraph 12:**  
[http://www.legislation.gov.uk/ukxi/2015/699/pdfs/ukxi\\_20150699\\_en.pdf](http://www.legislation.gov.uk/ukxi/2015/699/pdfs/ukxi_20150699_en.pdf)
  - This section describes the circumstances under which the Distributor will have to pay a penalty to the consumer for interruption of supply.
  - These include:
    - failure to give to the customer prior notice of not less than the prescribed period, stating the day on which the supply is or is expected to be interrupted or
    - interrupts the supply on a day other than a day stated in the notice

## Meter Operator Code of Practice Agreement (MACOPA)

- The current mechanism through which distributors enact competency and consent requirements, publication of safety information, restrictions and general information for safe working and for hazard reporting for Meter Operators.
- All de-energisation work has to be carried out at the request of the Supplier.

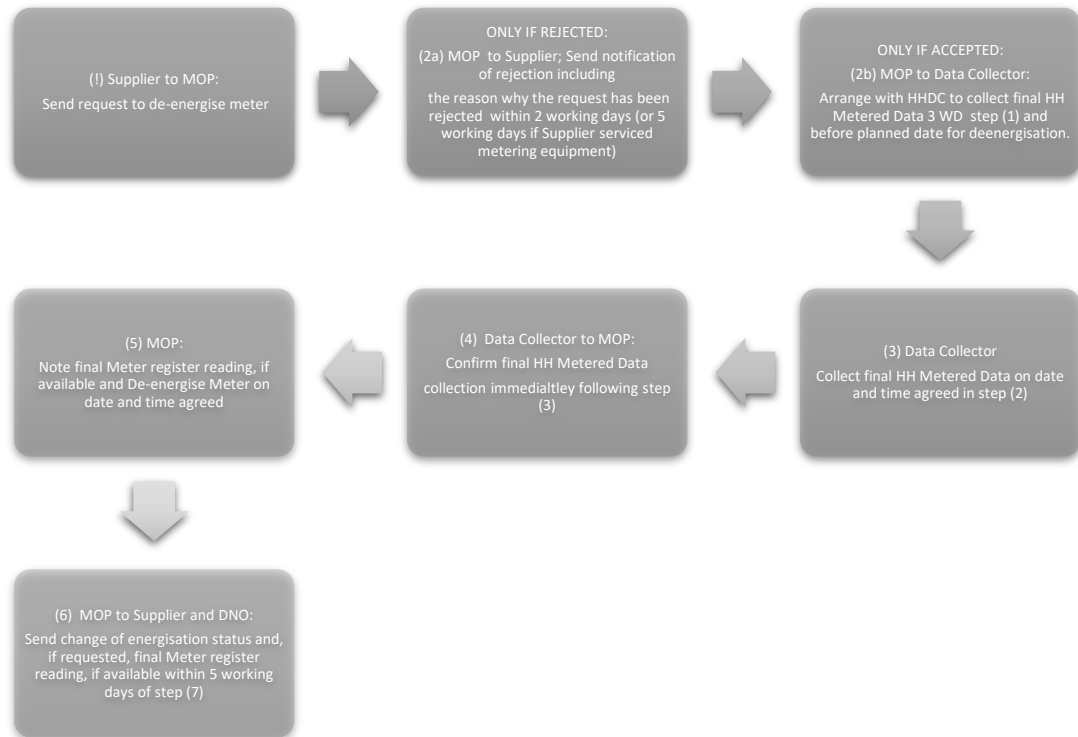
## Balancing and Settlement Code: BSCP514 – SVA Meter Operations for Metering Systems Registered in SMRS

<https://www.elexon.co.uk/csd/bscp514-sva-meter-operations-for-metering-systems-registered-in-smrs/>

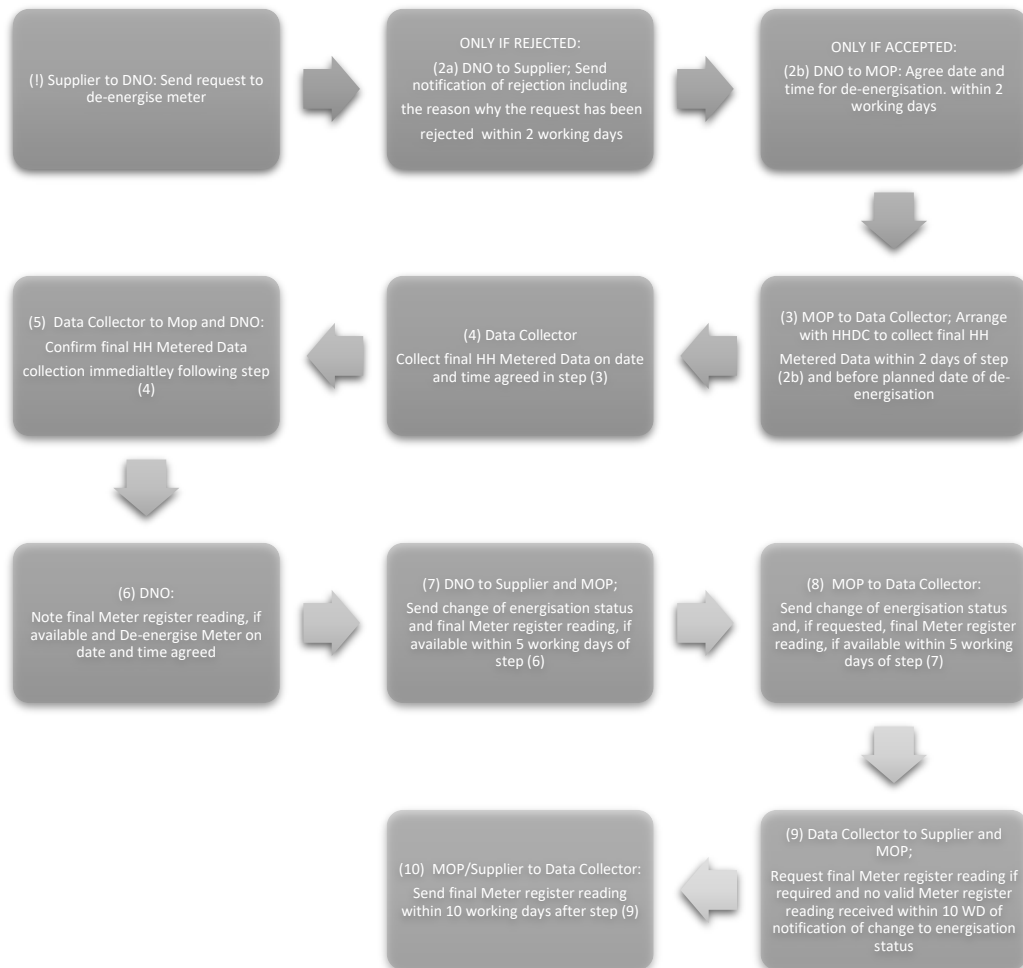
- **'Clause 2.3 Metering Obligations (2.3.1 Energisation of Meters)**
  - *The MOA shall only energise an SVA Metering System if requested to do so by its Associated Supplier.*

- *The MOA shall as soon as reasonably practicable inform its Associated Supplier, the Associated Data Collector and the LDSO of any change in the energisation status of any SVA Metering System to which it has been appointed.*
- *A remotely disabled smart Meter or advanced Meter should be treated as energised for the purposes of Settlement'*
- **The Meter Operator can only energise a meter if requested by the Supplier and must notify the data collector and LDSO of any changes in status to ensure proper settlement.**
- **'Clause 2.4.1 Information to Data Collectors and Suppliers**
  - *(D) Except in an emergency, the MOA shall give its Associated Half Hourly Data Collector sufficient notice of the installation, repair, removal, reprogramming, energisation or de-energisation of any Meter associated with an HHDC-serviced Metering System for which the Associated Half Hourly Data Collector is responsible to enable the Associated Half Hourly Data Collector to recover the data required for Settlement using its normal method of data collection. In the case of Supplier-serviced Metering System, the MOA shall give such notice to its Associated Supplier'*
  - *E) The MOA shall provide initial / final Meter readings to its Associated Data Collector following installation, removal, reprogramming, energisation, deenergisation or replacement of a Meter by the MOA, as appropriate and in accordance with this BSCP.*
  - **The Meter Operator is required to tell the data collector of any energisation or de-energisation of the meter to ensure proper settlement. It is also required to provide final meter read.**
- BSC Codes of Practice require Meter Operators to seal Meters and other Metering Equipment (including the DNO's cut out equipment) in accordance with the Meter Operator Code of Practice Agreement. These sealing requirements provide a level of assurance to Settlement that Metering Equipment has not been tampered with.

- Under BSC BSCP514 the process below is required when a Supplier de-energises a meter:



- Under BSC BSCP514 the process below is required when a Supplier asks a DNO to de-energise a meter:



- BSCP514 sets out the process for MOPs working on meter de-energisation, clear processes are in place.

## Health and Safety at Work Act 1974:

- The Health and Safety at Work Act 1974 does not contain any provisions relating specifically to electrical safety.
- Section 3 states that works carried out should not expose any persons to risks to their health and safety. For example, a contractor who installs a new circuit in a domestic property but leaves it in a dangerous condition is in breach of section 3.

- Section 8 prohibits intentional or reckless interference or misuse of anything provided in the interests of Health and Safety. This could apply to intentional interference of supply during isolation.

#### **Distribution License:**

- Makes reference to “terms, arrangements and procedures that are to apply or to be available to the user in respect of such activities or works (including the energisation, de-energisation or re-energisation of Entry Points and Exit Points) as may be carried out by or on behalf of the user on the licensee’s Distribution System”. Does not seem to have any specific requirements other than requiring the compliance with applicable requirements elsewhere.

The Association of Meter Operators website recommends electricians visit DCUSA FAQs for help on de-energisation; I cannot find this on the DCUSA website.

#### **Summary:**

- The BSC states that nobody can make changes to a connection from a distributor’s network to a consumer’s installation without the DNOs consent.
  - The DNO can only authorise work if there is no interruption to Supply
  - If there is interruption to supply than they will require the Suppliers consent.
- The BSC has process in place for the de-energisation of meters however it is clear these are not being followed and may not be understood.
- The DNO is liable for financial penalties (payable to the consumer) if they do not arrive on site to undertake works at the time agreed.
- MACOPA requires de-energisation work to be carried out at the Suppliers request
- Health and Safety legislation requires that people working on properties should not be doing anything that exposes them, and others, to any risk of harm. This is relevant to safe working on isolators.

#### **Conclusion:**

Isolation of supply covers many different articles of regulation and legislation. This mass of differing requirements can sometimes be seen to compliment each other while other times they can confuse and compete with each other.

The BSC has a clear process which should be followed, however this process limits the commercial activities of some electrical contracts; for example the supplier or DNO is permitted to take up to 48 hours to respond to a request for de-energisation after which they can agree a suitable time to visit site. If an electrician is onsite and requires de-energisation this means they could not complete the works until the supplier/DNO has responded.

The requirement for communication between the party de-energising the meter and the Meter Data Collector to ensure Balancing and Settlement is correct is also a risk. Would a typical electrician be able to identify who to contact, when and with what information? This needs to be considered in any scheme.