

3 December 2013

Alan Wells
Certification Director
NICEIC
Warwick House
Houghton Hall Park
Houghton Regis
Dunstable LU5 5ZX

Dear Mr Wells

Cut-Out Fuses; Isolation by Electrical Contractors

I refer to your recent letter and many previous meetings and discussions regarding the withdrawal of cut out fuses by DNO staff for work being carried out on customer's premises by electrical contractors. Your letter was also discussed in detail at recent meetings of ENA's Safety Health Environment Committee and Electricity Networks and Futures Group.

ENA and the DNOs share your frustration. This is clearly never going to be a trivial matter, but we believe that the problem is greatly aggravated by the current setup, where Suppliers, who traditionally hold the resources to deal with the practicalities, have never seen it important to use the resources to provide good customer service in this area.

The industry has a large number of fully authorized staff engaged in this work daily via Meter Operators working for Suppliers. As the industry works to the "Supplier Hub" principle, it is Suppliers who are responsible for arranging all the services on the customer premises. This is how the industry was set up in 1998 to support the opening of the competitive market to domestic customers.

In 1998 five key agreements were also put in place to define responsibilities for domestic customer metering/service position issues.

- Use of System (UoS)
- Prepayment Meter Infrastructure Provision (PPMIP)
- Data Collection
- Data Aggregator
- Meter Operator (Mop)

On licence separation under the Utility Act, the UoS system agreement was ours (i.e. between DNOs and Suppliers) and the other four moved to the Supply businesses.

The MOp agreement covered for the de-energisation of the customer's installation via the withdrawal of the DNO cutout fuse – and the Meter Operation Code of Practice Agreement (MOCOPA) covered off DNOs need to control the safety aspects of the MOp activities.

The UoS agreement became Distribution Connection and Use of System Agreement (DCUSA) and therefore the basic design of the arrangements is that Suppliers arrange all de-energisations etc, unless they physically cannot do it for some reason.

This is catered for in section 25.1 of DCUSA, attached in Appendix I:

The issue of access to DNO cut-out fuses by electricians was addressed by DCUSA DCP38 change proposal in 2008/2009 by UK Power Networks (EDF Energy as they were at the time) on behalf of ENA member companies.

However, the proposal was withdrawn due to lack of acceptance by Suppliers and Meter Operators as the Electricity Act (1989 as amended) holds Suppliers responsible for the de-energisation when work is to be carried out on the customer side. DNO's only operate the cut out fuse for safety or operational reasons on their networks.

Fundamentally, there is no way for electricians to be granted access through any other route than a change in legislation or alternatively through commercial consent of the Suppliers via DCUSA.

Furthermore, Ofgem is currently looking at Revenue Protection issues and non-identifiable third party access and use of non-identifiable seals would be problematic.

We would suggest that in the first instance you refer back to DCUSA change proposal DCP038 and the detailed reasoning for its lack of acceptance.

One solution that has been discussed in the past is the installation of double pole disconnectors in the consumers' tails at each meter change, especially with the proposed smart meter programme commencing. However, this would again need to be discussed, agreed and additional costs need to be considered.

ENA and our member companies have tried to be as helpful as we can but we would respectfully suggest that in order to take the matter forward you contact the Suppliers, either directly or via their trade body Energy UK.

If there are any queries, please do not hesitate to contact myself, or Paul Fidler, my Director of Operations.

I would be grateful if you could forward this onto the other signatories.

Yours sincerely



David Smith
Chief Executive

cc: Guiliano Digilio – ECA Head of Technical Services
 Frank Bertie – Technical Director, NAPIT Group
 Steve Mitchell – Division Director ECA Services Div
 Bob Ciarney – Technical Services Manager, SELECT
 Gareth Evans – Head of Profession Engineering, Ofgem
 Penny Taylor – Unit Head, HSE

Appendix I

DCUSA Section 25.1

25.1 Energisation Works, De-energisation Works and Re-energisation Works carried out by or on behalf of the User (supplier) pursuant to this Clause 25 shall be carried out by a person who is either engaged by the Company (distributor) to carry out such work or who:

25.1.1 is an Approved Contractor, in accordance with the procedure set out in Schedule 5;

25.1.2 is a Competent Person to whom a Permission has been issued, in accordance with the procedure set out in Schedule 5, to carry out the particular activities comprising the Energisation Works, De-energisation Works or Re-energisation Works; and

25.1.3 acts in accordance with the requirements set out in Schedule 5.

25.2 Where:

25.2.1 neither the User nor any of its contractors is an Approved Contractor; or

25.2.2 no employee of the User or any of its contractors (if Approved Contractors) holds a Permission; or

25.2.3 the User does not have the rights of access required to undertake such Energisation Works, De-energisation Works or Re-energisation Works; or

25.2.4 the parties so agree,

the Company shall, to the extent that it may lawfully do so, at the request of the User, when the User is entitled to have carried out Energisation Works, De-energisation Works and Re-energisation Works, carry out such works at the cost of the User within a reasonable time or, in circumstances of urgency, as soon as is reasonably practicable. The Company shall on request by the User inform the User of its reasonable requirements for the details by reference to which Metering Points or Metering Systems to be Energised, De-energised or Re-energised are to be identified.