Part A: Generic

DCUSA Change Proposal (DCP)	At what stage is this document in the process?
# DCP 390: ## DCP Title: Provision of Isolations for Safe Working on Customers' Electrical Installations Date raised: 14 April 2021 Proposer Name: Kevin Liddle Company Name: Northern Powergrid Company Category: DNO	**01 – Change Proposal** **02 – Consultation** **03 – Change Report** **04 – Change Declaration**

Purpose of Change Proposal: To define process detailing how a customer can obtain timely main supply electrical isolations to allow for safe working on their electrical installations.

✔	Governance: The Proposer recommends that this Change Proposal should be: • Part 1 Matter • Treated as a Standard Change The Panel will consider the proposer's recommendation and determine the appropriate route.
!	Impacted Parties: Supplier parties/DNO parties
!	Impacted Clauses: Introduction of new Clause

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Indicative Timeline

The Secretariat recommends the following timetable:	
Initial Assessment Report	21 April 2021
Consultation Issued to Industry Participants	May 2021
Change Report Approved by Panel	21 July 2021
Change Report issued for Voting	23 July 2021
Party Voting Closes	13 August 2021
Change Declaration Issued to Authority	17 August 2021
Authority Decision	21 September 2021

Any questions?

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1 Summary

What?

1.1 When undertaking planned electrical installation work at a premise, the customer's electrical installer often requires the installation to be de-energised from the main supply (i.e. isolated from the distribution system to stop electricity flowing). Due to the absence of a clear safe isolations process (de-energisation) being offered by industry, Customers, Electricians and Low Carbon Technology (LCT) installers are often frustrated when attempting to obtain a supply isolation causing them delays and abortive time. On a high number of occasions, the lack of an effective safe isolation service, or clear process, leads to these parties undertaking unauthorised isolations themselves.

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1.2 Electrical installers appointed by the customer are not permitted to undertake de-energisation work on network operator equipment (equipment owned by DNO, iDNOs or BNOs). Compliance with the Electricity at Work (EAW) Regulations 1989 requires that individuals involved in work to be performed on live connections have received the appropriate training and have sufficient understanding of the equipment that they are operating. This is covered in The EAW guidance document HSG85, page 10, paragraph 24.

1.3 All parties agree that a much clearer isolation process is required and this needs to be effectively communicated to all customers so as to offer a practical and workable solution to provide a safe option to obtain a supply isolation and discourage unauthorised, unsafe isolations by unauthorised individuals. This would make a significant contribution to the reduction of dangerous incidents which have the potential to cause injury.

1.4 A DCUSA Safe Isolations Working Group was set up seeking to improve the current arrangements to improve customer service, provide a consistent and effective process, encourage safe working and support compliance with the Electricity at Work Regulations. This CP seeks to implement the changes that would meet these objectives.

Why?

1.5 There are over half a million consumer unit replacements per year in the UK and all these works require the isolation of the main supply for safe working. Electrical Safety First, and others, have advised that many of these replacements occur without an authorised person being called to site to undertake an isolation. In cases where the customer's electrician undertakes an unauthorised isolation themselves, the cut-out seals, which are designed to act as a deterrent to unauthorised interference and are a requirement of the ESQCR 2002, are broken. Unauthorised interference could adversely affect the safety of the building and its occupants. In the worst cases, access to the Network Operator and Supplier equipment by unauthorised parties can also result in serious injury as the individuals involved will not necessarily have the training, equipment and awareness needed to manage the potential risks involved as is required by the Electricity at Work (EAW) Regulations 1989.

1.6 Customers, Electricians and LCT Installers are frustrated by the challenge of obtaining timely and efficient electrical isolations for safe working on customers' electrical installations. This problem is likely to escalate further due to the predicted increase in the amount electrical work in domestic premises as consumer uptake of LCT increases and also with changes in the wiring regulations. The recently published Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020 places additional requirements on landlords to maintain a compliant electrical installation and will clearly add to this problem as it requires regular inspections of domestic installations and remedial actions when problems are found. This increased electrical installation activity is very likely to lead to more unauthorised isolations unless an effective industry-led alternative is implemented by suppliers as the responsible party.

How?

1.7 Currently there is no clearly defined mechanism or service level for providing isolations for safe working. This is creating a growing problem due to the increases of electrical installation activity as discussed above. Introducing a clear responsibility statement and process with a suitable service level for safe isolations into DCUSA will ensure the work is done by the correct party using persons with the required competencies and training, ensuring that the safety of the installation and building occupants is not compromised.

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1.8 Network Operator parties hold the view that Suppliers manage the customer relationship, together with metering and the energisation status of the supply, and are the party with ultimate responsibility for providing a safe isolations service for their customers. Clause 25.2 of DCUSA also sets out the circumstances where a supplier can request assistance from the DNO.

1.9 Network Operator parties state that obligations for the status of supply was determined during business separation in 1998 to support the opening of the competitive market and is supported by the clauses and intent of Sections 25 and 41 of the DCUSA.

In 1998 five key agreements were 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)

The MOp agreement covered for the energisation and de-energisation of the customer's installation via the withdrawal of the Network Operator cut-out fuse with the Meter Operation Code of Practice Agreement (MOCOPA) covering off the Network Operator's need to receive assurance on the safety aspects of the MOp activities.

1.10 Network Operator parties propose that the DCUSA legal text should be reviewed to require suppliers to publish their safe isolations application process giving clear guidelines on the expected timescales in order to effectively manage customer expectations. Suppliers may choose to delegate this responsibility to their appointed Meter Operator or agree alternative arrangements, through DCUSA, which may transfer the task to other industry parties with their agreement.

1.11 Supplier parties hold the view that they do not have to provide an isolation service to customers. They are of the opinion that it should be left to the market with only MOCOPA accredited organisations able to offer a service. Suppliers also state that it should be possible to progress a DCUSA change (followed by a MOCOPA change) that would permit any MOCOPA authorised meter operator party to undertake safe isolations at a customer's request, even in circumstances where the MOP party is not appointed by the incumbent supplier at the premises. This would be a separate proposal that will progress via another DCP at a later date.

1.12 Supplier parties hold the view that DCUSA already allows for either a Supplier or a Network Operator to undertake safe isolations for customers and that any further clarification or changes that are made to DCUSA should include the option for Network Operators to provide a safe isolation service to customers.

1.13 The DCUSA Safe Isolations Working Group was unable to conclude on a preferred option to progress with improvements to the current provision of safe isolations due to the differences in views between parties on which party has the ultimate, last resort, responsibility for the provision of the service. This change proposal therefore puts forward two options for consideration reflecting the main differences of the views within the subgroup:

<u>Option A</u>

DCUSA legal text should be reviewed and changed to require suppliers to publish their safe isolations process giving clear guidelines on how a customer should request an isolation/de-energisation and provide details of the expected timescales in order to effectively manage customer expectations. Legal text should detail the minimum service levels for the isolations service and

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allow for Suppliers to delegate this responsibility to their appointed Meter Operator or agree alternative arrangements, through DCUSA, which may transfer the task to other industry parties with their agreement. A draft process is provided in Appendix 1A.

Option B

Changes should be made to DCUSA to include the option for Network Operators, as well as Suppliers, to provide a safe isolation service to customers without the express consent of the Supplier. The changes should include the description of a clear safe isolations process that should be followed by all parties undertaking isolations. This will require changes to Section 25 and Section 41 of DCUSA to expand the list of scenarios where a Network Operator can undertake de-energisation and re-energisation of supplies. A draft process is provided in Appendix 1B

2 Governance

Justification for Part 1 and Part 2 Matter

2.1 This change proposal should be treated as a Part 1 Matter as it is likely to have a significant impact on the interests of electricity consumers and it is directly related to the safety or security of consumers.

Requested Next Steps

2.2 This Change Proposal should:

- Be treated as a Part 1 Matter
- Be treated as a Standard Change
- Proceed to a Working Group

3 Why Change?

3.1 There are over half a million consumer unit replacements per year in the UK. It is very clear that the vast majority of these replacements occur without the Supplier being called to site to undertake an isolation. This is because, anecdotally, the service offered has long lead times with inflexible time slots which are impractical in the majority of situations. This poor service encourages the customer's electrician to take matters into their own hands and undertakes the isolation themselves (illegally). The cut-out seals, which are a requirement of ESQCR 2002 and designed to act as a deterrent to unauthorised interference, are broken and not replaced. Unauthorised interference: is likely to be carried out in an unsafe manner as they will not necessarily have the training, equipment and awareness needed to manage the potential risks involved; and could adversely affect the subsequent safety of the building and its occupants.

3.2 Customers and their electricians are frustrated by the lack of clarity and lack of co-operation from industry in obtaining timely and efficient main supply electrical isolations for safe working on customers' electrical installations.

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3.3 It is believed the expected uptake in electrical work in consumers' premises associated with the installation of Heat Pumps and Electrical Vehicle Charging Points and the new requirements for landlord electrical inspections will result in an increase in unauthorised, and potentially unsafe working with a corresponding increase in the risk of injury.

3.4 A culture of uncontrolled isolation can also lead to increased revenue protection issues and inadequate sealing of the cut-out and metering equipment which in turn may also lead to personal Injury and damage to property.

3.5 Clarifying responsibilities for standard domestic isolations removes the current uncertainty and confusion and will promote a more efficient and better co-ordinated Industry approach. Customers can be advised with certainty who will deliver the service without debate, confusion or delay.

Part B: Code Specific Details

4 Solution and Legal Text

Legal Text

4.1 The legal text is to be developed for Option A and Option B. Further discussions will be necessary to arrive at suitable service standards that would be achievable by responsible party while at the same time meeting customer expectations.

5 Code Specific Matters

Reference Documents

Process Map for provision of isolations (Attachment 1)

Working group minutes with solution option analysis.

6 Relevant Objectives

DCUSA General Objectives	Identified impact
☐ 1 The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks	None
☒ 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	Positive

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☒3 The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences	Positive
☒ 4 The promotion of efficiency in the implementation and administration of the DCUSA	Positive
☐ 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
Objective 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. The change does this because it removes confusion and uncertainty of scope and makes clear which party is obliged to deliver the service. **Objective 3 The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences.** The change does this because it removes confusion and uncertainty of scope and makes clear which party is obliged to deliver the service as for option A will stop network parties being diverted from undertaking their own obligations. **Objective 4 The promotion of efficiency in the implementation and administration of the DCUSA.** The change does this because it removes confusion and uncertainty of scope and makes clear which party is obliged to deliver the service and minimises delays and time wasted trying to meet customer expectations when parties are unclear/uncertain that they have ultimate responsibility to deliver the service to their customers.	

7 Impacts & Other Considerations

7.1 Building owner being agnostic to the end Supplier when arranging electrical work on their properties.

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

7.2 N/A

Does this Change Proposal Impact Other Codes?

BSC ☐

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CUSC	☐
Grid Code	☐
MRA	☐
SEC	☐
Other	☐
None	☒

Consideration of Wider Industry Impacts

7.3 In January 2009 UKPN put forward a change proposal (DCP038) to DCUSA to establish a governed 'Electricians Access Scheme'. This was rejected by Suppliers who did not wish to be exposed to the perceived potential liabilities from such an arrangement. Suppliers had concerns that:

- they would be taking on unacceptable liability risk associated with disturbance to meter tails; and
- electricians would consider the meter seal similarly breakable, increasing the likelihood that electrical contractors would work on meter terminals and replace customer tails into the meter.

Confidentiality

7.4 This Change is not confidential.

8 Implementation

8.1 This change will deliver immediate benefits and efficiencies and should therefore be implemented as soon as reasonably practicable. This will be determined from the industry consultation.

Proposed Implementation Date

8.2 To be determined following further industry engagement.

9 Recommendations

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Appendix 1A

Safe Isolations Process

Option A – Supplier Obligation

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Appendix 1B

Safe Isolations Process

Option B – Supplier and/or Network Operator Obligation

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