

**DCP 390 'Provision of Isolations for Safe Working on Customers' Electrical Installations COLLATED
CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS**

| Company | Confidential/ Anonymous | 1. Do you understand the intent of DCP390? | Working Group Comments |
|---------------------------|----------------------------|---|------------------------|
| NAPIT | Non- confidential | Yes | |
| Certsure LLP | Non- confidential | Yes | |
| EDF | Non- confidential | Yes | |
| ENWL | Non- confidential | Yes, we do understand the intent of this change proposal. | |
| NPg | Non- confidential | Yes | |
| Ground Control Ltd | Non- confidential | Yes | |
| WPD | Non- confidential | Yes | |
| SSE Energy Supply Limited | Non- confidential | Yes | |
| BUUK | Non- confidential | Yes, we are aware of the intent in relation to this DCP. | |

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| <p>Association of Meter Operators (AMO)</p> | <p>Non-confidential</p> | <p>No. There are generally three scenarios where there is a requirement for an electrical isolator to be installed between the electricity meter and the consumer unit. In all of the following three examples it is necessary for the DNO Fuse to be withdrawn.</p> <ol style="list-style-type: none"> 1. A consumer at a single premise: <p>In this scenario the energy consumer contacts their electricity supplier and requests the installation of an isolator. The supplier agrees to the request and passes a work instruction to their appointed Meter Operator (MOp) The work is completed by a person authorised to do so. We do not believe that this proposal improves this process in any way. There are anecdotal reports that non-authorized electricians are bypassing this route and withdrawing the DNO Fuse by not engaging with the electricity supplier.</p> 2. A Local Authority (LA) or Housing Association (HA): <p>In this scenario the LA or HA as the property owners wish to perform electrical refurbishment to their properties, there are often hundreds or thousands of properties involved. The current industry structure requires the LA or HA to contact each of the tenants and obtain details of the electricity supplier. It is then necessary to contact each of the electricity suppliers and arrange a co-ordinated approach. This proposal does not address this issue. It is this issue that causes the vast majority of DNO Fuses being withdrawn without the appropriate authority.</p> | |
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| | | <p>3. Low Carbon Technology (LCT):</p> <p>In this scenario an LCT provider (eg electric vehicle chargepoint installer) contracts with multiple households, often thousands where it is beneficial to the consumer for the chargepoint to be installed at the same time as the installation of the isolator and the DNO Fuse withdrawal. Similar communication logistical issues as mentioned in scenario 2 apply to this scenario. This proposal does not support this issue.</p> <p>The intent of this proposal does not address any of the scenarios above.</p> <p>In the Summary Section 1.1 the proposer refers to “A high number of occasions.....” Whilst we understand this in relation to scenarios 2 & 3 we do not recognise that there are a high number in relation to this change proposal.</p> <p>The intent seems to suggest that DNOs are undertaking this work due to complaints from consumers. We do not recognise this and note that no metrics have been provided. We are aware of one DNO who undertake this work on a commercial basis with the consumer, we are not aware of other DNOs carrying out this work and believe this proposal is flawed. The AMO did ask the working group to provide metrics to substantiate this proposal but the working group declined this request. The detail requested:</p> | |
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| | | <p>a. <i>Does your Distribution Business install isolators if requested by the end consumer?' if yes;</i></p> <p>b. <i>How many isolators has your business installed between the cut-out and consumer unit in the last 12 months where the request has been received directly from the end consumer?</i></p> <p>c. <i>How many of these were part of a new connection?</i></p> <p>d. <i>How many of these were as a result of a Service Alteration carried out by the Distribution Business?</i></p> <p>e. <i>How many of those in 'b' above has the consumer indicated that they had previously been unsuccessful following a request to their energy supplier.</i></p> <p>In Section 1.5 the proposer refers to 500k consumer unit replacements per year. We do not dispute this number but we do not believe that there is any correlation with this proposal. The number suggests that consumers are unable to obtain their electricity supplier to install an isolator. This is not the case. Using this 500k figure implies a problem for which evidence has not been provided, see the request for information mentioned above.</p> | |
| UK Power Networks | Non-confidential | Yes | |
| ScottishPower Energy Retail Ltd | Non-confidential | Yes – this CP is to move responsibility solely onto suppliers | |

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| Utilita Energy LTD | Non-confidential | We understand that the intent of DCP390 is to improve the customer journey when seeking safe isolations, and to ensure a clear definition on which party is ultimately responsible for this process is within DCUSA. | |
| British Gas | Non-confidential | We understand the intent however do not agree with the proposal. | |
| SP Energy Networks | Non-confidential | Yes | |
| Electrical Safety First | Non-confidential | Yes – fully | |
| Working Group Conclusions: | | | |

| Company | Confidential/Anonymous | 2. Are you supportive of the principles of DCP390? | Working Group Comments |
|--------------|------------------------|--|------------------------|
| NAPIT | Non-confidential | Yes | |
| Certsure LLP | Non-confidential | Yes | |
| EDF | Non-confidential | Yes | |

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| ENWL | Non-confidential | We are supportive of the principles. | |
| NPg | Non-confidential | Yes | |
| Ground Control Ltd | Non-confidential | I am supportive of the principles of ensuring safety and compliance within the industry. I do not believe that DCP390 reflects this, which is reflected within this change proposal and the 'Proposed MOCOPA Change, 17 Jun 2021' slide deck, it is believed that on hundreds of thousands of occasions, electricians remove the main head fuse within a property due to a lack of clear and practical industry guidance and procedure, which has inherently become custom and practice. With the industry not enforcing regulations due to a lack of suitable solutions for stakeholders, this has inherently promoted unsafe working methods and practices. | |
| WPD | Non-confidential | Yes | |
| SSE Energy Supply Limited | Non-confidential | Yes. We agree with the principles of DCP 390 but we do not agree that this will necessarily resolve the issues identified by the Proposer. | |
| BUUK | Non-confidential | Yes, we are fully supportive. | |
| Association of Meter Operators (AMO) | Non-confidential | No. We believe the basis for the proposal to be flawed and would provide no benefit to the consumer. | |

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| UK Power Networks | Non-confidential | Yes | |
| ScottishPower Energy Retail Ltd | Non-confidential | <p>No, we do not agree with the DCP as it does not actually solve the issue. Our preference would be for a wider industry discussion to resolve the issue to ensure the industry as a whole can fully support increasing requests in the future rather than fail to do it by amending 1 clause in DCUSA.</p> <p>For example, if a supplier does not have the capacity to resolve request, the DNO could provide a "fall back" position to help the customer. This would be a considerably smaller %.</p> | |
| Utilita Energy LTD | Non-confidential | We cannot support DCP390 at this time due to the limited benefits, however we would support a modification that addresses the concerns within the consultation document (abortive times, multiple suppliers, poor customer journey), such as that within our answer to question 7. In addition to this, we do not see why this needs to be implemented at a code level rather than agreed as best practice. | |
| British Gas | Non-confidential | No, we do not believe this will be of benefit to the consumer and DCP394 would better support the intent | |
| SP Energy Networks | Non-confidential | Yes | |
| Electrical Safety First | Non-confidential | Yes | |
| Working Group Conclusions: | | | |

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| Company | Confidential/ Anonymous | 3. Do you agree with the proposer's view that the Supplier is the responsible Party for providing isolations for safe working on customers' electrical installations? If not, please provide your rationale for any alternative arrangement. | Working Group Comments |
|--------------------|----------------------------|--|------------------------|
| NAPIT | Non-confidential | Yes | |
| Certsure LLP | Non-confidential | Yes | |
| EDF | Non-confidential | No, we believe it should be supplier & DNO who should be responsible party. | |
| ENWL | Non-confidential | We agree with this view as the Supplier manages the relationship with its customers, including metering and the energisation status. We believe this responsibility is captured under DCUSA Section 25 – Energisation, De-energisation and Re-energisation. | |
| NPg | Non-confidential | Yes | |
| Ground Control Ltd | Non-confidential | No. When installing a 2-pole isolator switch, the main head fuse is pulled (DNO property). Once pulled and isolated, the customers meter tails are either cut or removed from a Henley block. The isolator switch is then fixed to these tails and reconnected to either the unterminated cables or Henley block. At no stage is the Supplier's equipment touched or adapted. Suppliers argue | |

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| | | that there is a risk when engineers cut the consumers tails, it can loosen the joint within the meter, however this could be avoided with correct working practices and procedures. I believe the ability to isolate a property should lie with the DNO and the consumer only. | |
| WPD | Non-confidential | Yes, though does this solution cover all isolation requests, particularly from housing associations or councils where they require multiple properties to be isolated that could be fed by many different suppliers. | |
| SSE Energy Supply Limited | Non-confidential | As per our response to Q8 the Proposer has not made it clear whether this change is intended to apply to non-domestic isolations. The consultation implies this is to clarify "responsibilities for standard domestic isolations" whereas the legal text drafting would apply to all isolations. SSE Energy Supply Limited currently arranges appointments currently with MOp's - CT sites > 300amps DNO de-energisation. Suppliers, 300amps MOp de-energisation. | |
| BUUK | Non-confidential | Yes, we agree that the Supplier is the responsible Party. | |
| Association of Meter Operators (AMO) | Non-confidential | No. The fuse in question is under the ownership of the DNO. The current DCUSA and MOCOPA clauses allow for either the DNO or the appointed Meter Operator to withdraw the fuse. This proposal places the obligation on the supplier. If there was a need for a last resort responsible party then given that the DNO is the static industry party to the consumer or group of consumers (as in the scenarios 2 & 3) then this obligation could be placed on the DNOs. However, we believe that this is a shared responsibility whereby either the DNO or the appointed electricity supplier could undertake the work. | |

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| UK Power Networks | Non-confidential | Yes | |
| ScottishPower Energy Retail Ltd | Non-confidential | No, we do not believe this CP would actually stop the interference, it simply allows DNOs to point the customer to their supplier IF they call in the first place. | |
| Utilita Energy LTD | Non-confidential | Clauses 25.1 and 25.2 already establish that suppliers are the responsible party, and therefore we do not believe that any change to the DCUSA document is required. | |
| British Gas | Non-confidential | No, we disagree. The current obligation sits with DNO or the appointed Meter Operator. DCP394 would provide a better solution of isolation for consumers | |
| SP Energy Networks | Non-confidential | NO - Due to the policies set by UK Government's and to combat climate change through strict Carbon Net Zero target by 2045 in Scotland 2050 in Northern Ireland, England & Wales. The trained and technically competent qualified electricians and trained, technically competent operatives working in the private sector are trusted to install complex Low and Zero Carbon Technology for customers such as solar generation, battery storage, heat exchangers, Electric Vehicle charging points, these trained and technically competent operatives are being trusted in customer homes to decarbonise consumer's heat and transportation needs while making customers electrical installations safer. This is a valuable resource that are ideally placed to act professionally and more importantly safe to provide safe points of isolation | |

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| | | <p>to facilitate Low and Zero Carbon Technology including general electrical interventions such as rewires and consumer unit changes.</p> <p>This resource must be additionally trained and assessed as technically competent to work on certain types of service termination’s and provide a safe point of isolation to ensure “Safety from the System”, the correct level of PPE must be used while establishing the safe point of isolation, Flame, ARC retardant workwear, eye protection, insulated footwear including the correct tooling to carry out the work safely. This would prevent Supplier’s and DSO’s being a bottle neck in a process that cannot be effectively resourced nor policed by Supply nor Distribution authorities.</p> <p>High quality training and assessment is essential, apprenticeship programmes and external training centres should be influenced to properly train safe points of isolation, supported by industry experts.</p> | |
| Electrical Safety First | Non-confidential | Yes | |
| Working Group Conclusions: | | | |

| Company | Confidential/Anonymous | 4. Do you believe that a 10-working day service level agreement from the date of the request is appropriate? If not, please provide your rationale for any alternative proposal. | Working Group Comments |
|---------|------------------------|---|------------------------|
| NAPIT | Non-confidential | We agree that for non-emergency situations, a 10 day service level agreement provides a suitable compromise solution by allowing both electrical contractors and electrical suppliers plan their work. The provision of this service must be monitored, and the results published to hold the | |

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| | | <p>suppliers to account. There must be penalties for suppliers who do not meet this service level agreement for this change to be meaningful.</p> <p>Remote locations, e.g. the highlands in Scotland, need consideration. Will all location across the UK be covered by the 10 working day service level agreement. If not, how will these be dealt with? Clear guidance must be published to outline locations in and out of scope.</p> <p>It is essential that dedicated phone numbers are created, manned by people who understand the request being made, to enable this process to be as efficient as possible for the electrical contractor/homeowner. In a recent survey we conducted with our registered electrical contractors, when asked what the most common problem contractors face when contacting a supplier regarding removing and replacing service cut-out fuses was, the results showed:</p> <ul style="list-style-type: none"> • Finding the right number to call: 24% • Getting through to the correct department: 17% • Speaking to someone who understands the problem: 42% <p>More details about the survey can be found in answer to question 9.</p> <p>EMERGENCY SITUATIONS</p> <p>We request that consideration is given to introducing a minimum service level agreement for responding to emergency situations. We understand that a clear set of guidelines would need to be produced to prevent this emergency option being mis used, but in the interest of safety, emergency situations should have a response time of hours, not days.</p> | |
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| Certsure LLP | Non-confidential | Yes | |
| EDF | Non-confidential | Not at this time given the current priority required for Smart meter installs. Also it has been requested of the working party to provide all parties with job numbers expected for this activity so we can better understand impact if implemented. Until this is seen then we cannot commit to any service level agreement. | |
| ENWL | Non-confidential | This does seem to be a reasonable timeframe. | |
| NPg | Non-confidential | Yes – we believe a 10-working day SLA falls in line with other existing SLAs for de-energisation of a metering system within BSCPs 514 and 515. | |
| Ground Control Ltd | Non-confidential | <p>I strongly disagree.</p> <p>Suppliers do not have available resource to deliver within this timeframe and the UK is facing a major skills shortage, especially across the trade industry.</p> <p>According to Government Smart Metering Statistics, there were 16 million smart meters operating in smart mode in domestic properties in Great Britain as of 31 March 2020, representing 31% of all domestic meters. This leaves a balance of 30+million meters to be installed over the coming years by a collective group of 47 MOCOPA registered businesses. With such a demand on these businesses for smart meter installations, the UK's 270,000 electrical installation businesses can see mobilisation times of anywhere between 6 weeks and 6 months to have an isolator installed, having severe consequences on national rollouts such as local authority</p> | |

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| | | <p>consumer unit upgrade programmes, national electric fleet transitions and direct to consumer domestic installation work.</p> <p>New electric vehicle registrations accounted for 9.7% of all vehicle registrations at the start of 2021, with the fully electric Tesla Model 3 being the most sold vehicle in June 2021. With the ban of new ICE vehicles in 2030, demand will only increase. With 80% of vehicle charging expected to take place at home, we can expect to see a sharp increase demand on electric vehicle charging facilities within domestic properties over the coming years. PWC estimates that 72% of UK drivers have access to off-street parking. With 32million people registered to drive in the UK, assuming there are two drivers per household, 11.5million properties will require EV charging facilities as ICE vehicles are phased out.</p> <p>The requirement to install 2-pole isolator switches is not limited to EV charging. In order for electricians to safely isolate a property, for the purposes of upgrading the homeowner's consumer unit, they must first have an isolator installed. It has been highlighted within this document that there is a demand for over 1million consumer unit changes per year.</p> | |
| WPD | Non-confidential | Yes | |
| SSE Energy Supply Limited | Non-confidential | <p>No.</p> <p>Suppliers are dependent on MOp availability. For the majority of cases, 10 working days is sufficient, but we do have some arrangements where lead times are up to 15 working days. However, there are some instances (Islands, remote premises, time of year (weather) and resourcing</p> | |

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| | | <p>constraints, where 10 working days isn't possible and we wouldn't want to incur penalties as a result of this obligation for contracting partners availability.</p> <p>We would also highlight the inclusion of this timeframe within the legal text duplicates the existing obligation in The Electricity and Gas (Standards of Performance) (Suppliers) Regulations 2015, regulation 3(3). We would recommend that this is removed from the legal text to ensure that suppliers continue to adhere to the primary obligation.</p> | |
| BUUK | Non-confidential | <p>Yes, we feel that a 10-day SLA is appropriate as Safe Isolation requests are likely to increase in frequency with the ongoing rollout of Low Carbon Technologies. We also believe that Customers, and those working on the Customers behalf, should be able to achieve their Safe Isolation without undue delay and within a reasonable timescale.</p> | |
| Association of Meter Operators (AMO) | Non-confidential | <p>No. If this proposal was to be accepted with a 10 working day SLA an unnecessary burden would be placed on Suppliers and Meter Operators where the focus is clearly on the Smart Metering Implementation Programme where strict targets agreed with Ofgem could be placed in jeopardy.</p> <p>Whilst we believe this proposal should be rejected if it was to be accepted for the supplier or the DNO to be the responsible party then we would suggest that the clause be to use reasonable endeavours to complete the installation within 20 working days or at a later time where agreed with the consumer. Also see our response to Q5.</p> | |

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| UK Power Networks | Non-confidential | Yes | |
| ScottishPower Energy Retail Ltd | Non-confidential | <p>Our preference would be to not have a rigid SLA as it will depend on the customer confirming when they would like the job to take place.</p> <p>We believe if this was to be required it should have been mandated as part of the smart roll out. Suppliers have clear roll out plans with resourcing already at capacity. Forcing new SLAs on suppliers and their agents at this time will impact all customers not just those requesting isolators. Instead, the customer should agree with the supplier (or DNO or MOA) what works best for them, including any relevant charges for the work.</p> | |
| Utilita Energy LTD | Non-confidential | <p>Even when engineer resource is available, around half of our visits are booked with more than 10-working days notice. To meet a 10-working day SLA, we would incur significant costs in increasing our engineering capacity, particularly in the more remote areas of the country. With such a short SLA being proposed, we would expect a much more rigorous cost benefit analysis to be conducted on the impact of this SLA on service delivery.</p> <p>We understand and support the need to resolve the issue, and are aware of a MOCOPA created solution which we are, at present, supportive of. Introducing a 10-working day SLA will incur significant costs to suppliers, whilst not resolving the issues with the current process, and offering little benefit to customers.</p> | |
| British Gas | Non-confidential | No, we would expect a date agreed between parties involved based on needs and resource availability. | |

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| SP Energy Networks | Non-confidential | NO – Safe working on customers electrical installations should be carried out by trained and technically competent private sector personnel as to prevent bottle neck on Carbon Net Zero targets from Suppliers trying to facilitate exponential customer growing demands. | |
| Electrical Safety First | Non-confidential | Yes | |
| Working Group Conclusions: | | | |

| Company | Confidential/ Anonymous | 5. Do you agree that if this CP is approved, it should be implemented in the next DCUSA release following Authority approval? If not, please provide your rationale and details of any alternative implementation arrangements. | Working Group Comments |
|--------------|----------------------------|---|------------------------|
| NAPIT | Non-confidential | Yes | |
| Certsure LLP | Non-confidential | Yes | |
| EDF | Non-confidential | We think implementation timescale should be agreed by all parties first as this could have significant impact on resources. (Again numbers of jobs expected would be helpful). | |
| ENWL | Non-confidential | It seems appropriate for this change to be implemented in the next DCUSA Release following Authority approval. | |

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| NPg | Non-confidential | Yes | |
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| Ground Control Ltd | Non-confidential | <p>I do not believe that the timescales discussed within IWG, MOCOPA and DCUSA meetings are sufficient. It is believed that any changes to policy will not take effect until January 2022 at the earliest.</p> <p>At this time, hundreds of thousands of electricians are working unsafely across the UK. Those electrical businesses that are working to regulation are severely suffering and some have already been seen to go into administration.</p> <p>Customers and businesses across the UK are currently unable to upgrade unsafe property electrics, unable to install electric vehicle chargers and unable to install domestic low carbon technology without experiencing significant delays and varying, unregulated, costs by suppliers.</p> <p>It is important to note that up until the point at which a procedure is implemented for the installation 2-pole isolator switches is put in place, there will be a significant delay to all major EV fleet rollouts. With installation companies either required to upgrade consumer units to 18th edition standards or sourcing the supply from the properties meter tails, an isolator will be required to safely isolate the properties supply. Insisting that employees contact their energy supplier directly to have the isolation switches installed could create delays of up to 6 months and administration burdens for companies having to manage complicated expenses processes for the various charges set by each energy provider. Prohibiting the transition of UK fleets to electric will have severe consequences on the UK’s green initiatives and Build Back Better plan stated below.</p> | |

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| | | <i>"We will drive growth that is green: delivering our Ten Point Plan for a Green Industrial Revolution and taking action to fulfil our commitment to be the first generation to leave the natural environment in a better condition than we found it"</i> Rishi Sunak, Chancellor of the Exchequer | |
| WPD | Non-confidential | Yes | |
| SSE Energy Supply Limited | Non-confidential | No. We don't believe with the proposal should be implemented in conjunction with the Smart Meter Rollout. If the 10-working day obligation would be removed then the potential for implementation with the DCUSA release date, we could support. The resourcing impact would affect the adherence to the obligation within question 4. | |
| BUUK | Non-confidential | Yes, we agree this should be enacted at earliest possible implementation date. | |
| Association of Meter Operators (AMO) | Non-confidential | No. this is a critical period in the Smart Metering Installation Programme. If the proposal is accepted then we would suggest a sunset clause whereby the change would not come into force until 6 months after Ofgem have determined that the SMIP is complete. | |

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| UK Power Networks | Non-confidential | Yes, subject to supplier feedback on timeframe required to establish process for 10WD SLA and interaction with when the next DCUSA release falls, in which case a later date may be reasonable | |
| ScottishPower Energy Retail Ltd | Non-confidential | No – would require at least 6 months' notice to ensure resourcing (and budgets) increased. Further, we recognise that there is a limited pool of trained installers available for this type of additional work. Efforts will need to be made at an industry level to ensure sufficient volumes of appropriately trained engineers are available to undertake these work activities. | |
| Utilita Energy LTD | Non-confidential | If an SLA of 10-working days was to be implemented, we will need a longer timeframe to ensure we have time to acquire the necessary resource to meet the new obligation. | |
| British Gas | Non-confidential | No, we do not agree with the proposal and recommend it is withdrawn. | |
| SP Energy Networks | Non-confidential | NO – The solution needs to be resolved by the industry including EUSR skills academies to broaden existing training to permit safe compliant work on service terminations, including a robust mechanism for private electrical contractors to report Service termination defects, possibly similar to DCP195A process and SLA. | |
| Electrical Safety First | Non-confidential | Yes | |

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The Working Group Conclusions:

| Company | Confidential/ Anonymous | <p>6. Do you consider that the proposal better facilitates the DCUSA General Objectives?</p> <p>If so, please detail which of the General Objectives you believe are better facilitated and provide supporting reasons.</p> <p>If not, please provide supporting reasons.</p> | Working Group Comments |
|--------------|----------------------------|---|------------------------|
| NAPIT | Non-confidential | Yes - we agree with the assessment provided in the consultation with regards to a positive impact on General Objectives 2, 3 and 4. | |
| Certsure LLP | Non-confidential | Yes. We support any measures to facilitate the implementation of a clear procedure for arranging safe isolations. If accepted, this proposal should remove the main sticking point in the discussions thus far. | |
| EDF | Non-confidential | <p>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.</p> <p>Agree with this providing suppliers are able to perform this function regardless of who supplies them then this will allow promotion of competition.</p> | |

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| ENWL | Non-confidential | <p>As this change will unambiguously state which DCUSA Party is responsible for isolations we believe it will better facilitate DCUSA General Objectives 2, 3 and 4.</p> <p>It would support General Objective 1 by reducing the number of calls DNOs receive requesting that they temporarily isolate a supply.</p> | |
| NPg | Non-confidential | <p>Yes</p> <p>The proposal better facilitates objectives 2, 3 and 4, as it outlines the responsible party, without confusion, that is obliged to deliver the service of safe isolations. The proposal removes uncertainty of scope and makes clear which party is responsible for delivering the service, such that we believe it will minimise delays and time wasting and, therefore, enhance customer service.</p> | |
| Ground Control Ltd | Non-confidential | <p>Whilst this is considered a positive step in improving industry operating procedures and best practice, we believe further action is required in light of the ever-increasing demand for isolator switches across the UK for property electrics, EV charge points and alternative electric heat sources for the transition away from gas in 2025.</p> <p>Utilising the above procedure, installations (of all kinds) will require two visits. The first being by a MOCOPA registered metering business to install the isolator, the second being the electrician fitting the new consumer unit, charge point, or heat pump. If we were to assume that every property in the UK is to require one of the above over the next 10 years, this could equate to an additional 300,000 tonnes of unnecessary carbon emissions*.</p> | |

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| | | <p><i>*Figure based on an average 30mile round-trip journey per installation, using the UK's bestselling light commercial vehicle (Ford Transit) averaging 30.6mpg (allstar.com) using FleetWorld's Carbon Calculator.</i></p> <p>With an average UK cost for 3rd party isolator fitting currently at £95+VAT per install, compared to an average £20 cost for the isolator fitted on site during the electrical installation, this could mean an additional £2billion of cost to UK homeowners for converting to lower carbon technologies.</p> <p>Referring back to my earlier point on UK business' leading by example on the transition to low carbon technologies, the estimated financial cost for the 1.2million charge points required equates to £90million, with an estimated carbon impact of 14,000 tonnes. This cost, paired with the reduction in vehicle and charge point grants and the additional carbon offset costs is likely to have a significant negative impact on uptake across the country.</p> <p>When considering the feasibility of combining the two installations into one, it is important to understand the benefits of upskilling the 260,000 registered and qualified electricians across the UK. In order to become a fully qualified electrician, you must first have an industry recognised level 3 qualification, for example a level 3 diploma in electrotechnical services. This is usually achieved through an apprenticeship and can take up to four years to achieve (UCAS). In comparison, it takes, on average, 45 days to train and qualify for smart meter and isolator installations (EDF Energy). Across the industry, we are seeing more and more meter installers being upskilled to install EV charge points, with little to no experience in domestic electrical equipment. We have seen major Energy Suppliers promoting this practice</p> | |
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| | | which is of significant concern given the safety implications to UK homeowners. | |
| WPD | Non-confidential | Yes, general objectives 2 and 4 are better facilitated through this proposal. | |
| SSE Energy Supply Limited | Non-confidential | Regarding objective 4 this change may introduce marginal positive benefits to #4 but, as noted in our response to Q2, we do not consider that it will fully resolve the issues identified by the Proposer. | |
| BUUK | Non-confidential | Yes, we believe it meets the requirements of DCUSA Objectives 3.1.1, 3.1.2 and 3.1.3. in-line with the relevant comments contained within the DCP. In addition to the above, facilitation of Safe Isolation services within a specified period promotes improved customer service. | |
| Association of Meter Operators (AMO) | Non-confidential | No. We do not believe this proposals meets any of the DCUSA General Objectives. For the following reasons: (DCUSA General Objectives in italics) <i>3.1.1 the development, maintenance and operation by each of the DNO Parties and IDNO Parties of an efficient, co-ordinated, and economical Distribution System;</i> This proposal does not relate to the DNO Parties developing, maintaining or operating and is therefore not applicable. | |

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| | | <p><i>3.1.2 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;</i></p> <p>This proposal does not relate to effective competition etc and is therefore not applicable.</p> <p><i>3.1.3 the efficient discharge by each of the DNO Parties and IDNO Parties of the obligations imposed upon them by their Distribution Licences; and</i></p> <p>this proposal aims to place obligations on Supplier Parties and is therefore not applicable.</p> <p><i>3.1.4 the promotion of efficiency in the implementation and administration of this Agreement and the arrangements under it; and</i></p> <p>Not applicable</p> <p><i>3.1.5 compliance with the EU Internal Market Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Cooperation of Energy Regulators.</i></p> <p>Not applicable</p> | |
| UK Power Networks | Non-confidential | <p>We believe that this change better facilitates DCUSA General Objective two, three and four by removing confusion by making clear which party is obliged to deliver the service, and ensuring that customers or their electricians have a clear single path to enable the safe isolation where work is required. It will also ensure network parties are no longer being diverted from undertaking their own obligations where suppliers refuse.</p> | |

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| ScottishPower Energy Retail Ltd | Non-confidential | No as detailed we do not believe it actually resolves the issue | |
| Utilita Energy LTD | Non-confidential | We do not agree that this modification will have a positive impact on DCUSA general objective 2, and rather only has a neutral impact as the solution to DCP390 does not positively impact competition in the supply or generation of electricity. Beyond this, objectives 3 and 4 may be positively impacted by the addition of clarity to the DCUSA, although it seems somewhat redundant. | |
| British Gas | Non-confidential | We do not believe it better facilitates the DCUSA general objectives and DCP 394 should be viewed as an alternate solution. | |
| SP Energy Networks | Non-confidential | NO – The DCUSA General Objectives relating to the subject matter will be better served by increasing the resource pool within the private electrical contracting sector, this will provide customers with a better customer experience, prevent delay's in customers connecting Low and Zero Carbon Technology, removes legacy electrical risk faster. This will allow Suppliers, MOP's and DSO's to focus on their key deliverables in engineering the safe path to Carbon Net Zero. | |
| Electrical Safety First | Non-confidential | Yes. Successful implementation of the CP will improve clarity of responsibility for providing isolation services requested by consumers. It will also improve safety by introducing a clear mechanism and system for consumers and electricians to arrange temporary isolations. | |
| Working Group Conclusions: | | | |

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| Company | Confidential/ Anonymous | 7. Are you aware of any wider industry developments that may impact upon or be impacted by this CP? | Working Group Comments |
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| NAPIT | Non-confidential | <p>Scottish and Southern Energy Power Distribution’s PROCEDURE FOR THE REMOVAL AND REPLACEMENT OF COMPANY CUT-OUT SEALS BY ELECTRICAL CONTRACTORS, permits members of certain Trade Associations and Competent Person Schemes to remove and replace live cut-out fuses under certain circumstances: PR-PS-051 (1).pdf.</p> <p>This development is very welcomed by the Trade Associations, Competent Person Schemes and registered, competent installers who work in the areas covered by this agreement.</p> <p>We suggest that this procedure should be considered by all Electricity Suppliers, and to further compliment this procedure, that a Scheme should be created to register individuals who meet set competence and insurance requirements to undertake the removal and replacement of live cut-out fuses.</p> <p>We understand that this proposal has been rejected by many electricity suppliers, and we do support the DCP 390 Change Proposal as a way of moving forward with a solution that is acceptable to all and provides an improvement to the current situation but believe more could be done to make the process of safe isolation easier, quicker and cheaper for all involved without compromising on safety.</p> | |
| Certsure LLP | Non-confidential | No | |

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| EDF | Non-confidential | The DNO's are wanting to be able to move meters if a customer requests it of them, would this CP prevent them from doing so? We also believe that Suppliers should be able to carry out this function regardless of who supplies the customer which is currently another industry change that would need to be in place for this to be successful. | |
| ENWL | Non-confidential | No | |
| NPg | Non-confidential | No | |
| Ground Control Ltd | Non-confidential | Nothing that I am aware of at this time. | |
| WPD | Non-confidential | There is a proposal to allow any MOCOPA trained meter operative to undertake isolation work for any supply point. This will have an effect on how this change is implemented to all areas of industry that currently struggle to get isolation work completed, and could improve the housing association/council requests issue. | |
| | | | |
| SSE Energy Supply Limited | Non-confidential | Yes. The Smart Meter Rollout has affected the resource of MOp engineer availability therefore will impact the 10-working day SLA within question 4. | |
| BUUK | Non-confidential | None. | |

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| Association of Meter Operators (AMO) | Non-confidential | <p>There are a number of discussions taking place within the industry regarding how the scenarios 2 & 3 in question 1 can be managed. These will probably lead to proposals to change DUCUA & the MOCOP Schedule in the Retail Energy Code. The first proposal will be to allow any MOCOP Qualified party to undertake work upon receiving instruction from the Property Owner (or representative.) This would go some way towards resolving issues under Scenario 2. The Low Carbon Technology issues identified in Scenario 3 would be part of a wider discussion to identify if a Registration Scheme of Approved Persons could be introduced. However, this current proposal does not address these two issues but are mentioned here for context.</p> | |
| UK Power Networks | Non-confidential | <p>There is an issue raised with BNO's wanting to install isolators in multi occupancy properties where they are carrying out whole block electrical upgrades which would require an extension to the DCUSA possibly allowing suppliers to carry out isolation work on other suppliers customers where it is more efficient to coordinate with one party. This change does not disable or undermine this.</p> <p>It is generally accepted that electricians do not always use the process of contacting the supplier and if the process was more customer friendly (and in some cases available) that there would be an increased resource requirement.</p> | |
| ScottishPower Energy Retail Ltd | Non-confidential | <p>Will there be a knock-on impact on REC Metering, MOCOPA (currently doesn't allow MOP to carry out job if not appointed by the supplier for that MPAN) or Theft Schedules?</p> | |

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| Utilita Energy LTD | Non-confidential | There is another modification being jointly developed between DCUSA and MOCOPA parties, this seeks to enable customer appointed agents to carry out energisation works. This change proposal (if approved) will offer an actionable solution to the issues raised within this consultation; therefore, we would propose that any decision on this modification be put on hold to allow for both DCP390 and the new change to be considered together to avoid conflict or confusion. | |
| British Gas | Non-confidential | No | |
| SP Energy Networks | Non-confidential | YES – COP26 is likely to place further challenges to deliver electrical solutions to decarbonise customers heat and transportation needs, which if we do not embrace significant change as previously described in our response will have a detrimental effect on our ability to combat climate change safely within the timescales. There will be no new internal combustion engine car sales from 2030, the number of EV chargers will significantly increase driving the need for a large pool of resources outwith the Supplier, MOP, DSO pool. | |
| Electrical Safety First | Non-confidential | Electrical competent person scheme operators and trade bodies (NICEIC, Napit, SELECT and ECA), together with consumer safety organisations like ESF will promote the new initiative to electricians and consumers thereby helping to increase awareness of the change and its effectiveness. | |
| Working Group Conclusions: | | | |

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| Company | Confidential/ Anonymous | 8. Do you have any comments on the proposed legal text? | Working Group Comments |
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| NAPIT | Non-confidential | No | |
| Certsure LLP | Non-confidential | No | |
| EDF | Non-confidential | (No entry) | |
| ENWL | Non-confidential | <p>We believe the legal text will deliver the intent of the change, providing for an appointment being made within 10 Working Days and a 4-hour attendance slot. Our understanding is that the de-energisation/re-energisation would most likely take place on the same day and so the service level needs to accommodate this.</p> <p>We would just highlight that the clauses appear to need re-ordering/re-numbering eg 25.33 is shown before 25.32 and the note linking to DCP 383 does include a clause 25.32 as well, although this is expected to be confirmed on Authority Decision.</p> | |
| NPg | Non-confidential | Yes - please see our comments, as tracked in Attachment 2. | |
| Ground Control Ltd | Non-confidential | I do not believe the proposed legal text solves any of the issues within the industry. We must look towards the future, rather than the here and now, to ensure the country is prepared for the implementation of low carbon technologies. | |

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| WPD | Non-confidential | No | |
| SSE Energy Supply Limited | Non-confidential | <p>There is no reference to any changes to clauses within Clause 25 of Section 2A (Distributor to Supplier/Generator Relationships) Does the provision remain unchanged and the legal text is supplemental only - i.e. there is still a requirement for de/re energisation works to be carried out by DNO or by approved contractors / competent persons per Clause 25.1 and 25.2.</p> <p>In addition to our comments within question 4, a timeline of 10 working days are included for completing the de/re-energisation works following customer request. However clause 25.2, where similar works are undertaken by the Company (DNO) - no time period is prescribed. Users/Suppliers would be subject to a time period when the DNO is not.</p> <p>The legal text makes no distinction between domestic and non-domestic customers - so these provisions will apply to both domestic or non-domestic customer request.</p> <p>Finally, the legal text doesn't set out responsibility for costs of de/re-energisation works in this customer request scenario. Presumably this cost would be responsibility of Supplier/User and the Supplier/User would then recharge the Customer.</p> | |
| BUUK | Non-confidential | None. | |
| Association of Meter Operators (AMO) | Non-confidential | Provided that the legal text is approved without comment by DCUSA Legal Advisers we have no comment | |

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| UK Power Networks | Non-confidential | References to “customer”, “de-energisation”, “re-energisation” and “working day” should have leading capitals throughout. References to “de-energisation” and “re-energisation” in 25.34 should be to “De-energisation Works” and “Re-energisation Works”. Cross references in 25.35 are incorrect? Suggest this is also reworded as “references to the Customer shall include their representative”. | |
| ScottishPower Energy Retail Ltd | Non-confidential | As above – we do not believe this will actually stop the issue occurring and only clarifies who a customer should be contacting IF they call in the first place | |
| Utilita Energy LTD | Non-confidential | We have no comments regarding the legal text itself, and have previously made comment on the contents of the legal text. | |
| British Gas | Non-confidential | No comments on the legal text as we recommend this proposal is withdrawn. | |
| SP Energy Networks | Non-confidential | YES – The proposed draft Legal Text does not reflect the our response to DCP390. As such would require modified. | |
| Electrical Safety First | Non-confidential | No. | |
| Working Group Conclusions: | | | |

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| Company | Confidential/ Anonymous | 9. Any other comments? | Working Group Comments |
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| NAPIT | Non- confidential | <p>In July 2021 we undertook a survey of our members to ascertain the impact of the current situation regarding requesting the removal of service cut-out fuses to enable safe working. We received responses from 602 organisations, and below is a summary of the findings.</p> <p>When asked what the most common problem, contractors face when contacting a supplier regarding removing and replacing service cut-out fuses was, the results showed:</p> <ul style="list-style-type: none"> • Finding the right number to call: 24% • Getting through to the correct department: 17% • Speaking to someone who understands the problem: 42% • Other: 17% (below is a snapshot of the most common answers) <ul style="list-style-type: none"> - Advised to contact DNO - The issue is the delayed response on urgent isolation along with trying to book timeslots for consumer unit upgrades - No good in case of emergency - Time frame/getting a realistic date - Expensive - Getting engineers out on the time and day they say - They state they can only deal with the homeowner - All of the above. The suppliers say it is not their responsibility to remove and replace the fuse, they say it is the responsibility of the grid. You phone the grid and they tell you it is the suppliers | |

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| | | <p>responsibility. You end up going round in circles trying to be safe, competent and carry out your work scope correctly</p> <p>25% of respondents confirmed a supplier had refused a request from them to temporarily isolate an electrical supply, for the following reasons:</p> <ul style="list-style-type: none"> • not enough engineers available and had a huge waiting list • admin/staff problems • Didn't understand the requirements T • old to just remove seals • Told they did not have anyone available, and they suggested I just remove it myself • Person on phone not understanding what I was asking of them • Too busy, only responding to emergencies • They used COVID as an excuse • The call handler couldn't understand the request • Said it was the DNO's responsibility • They told me by email that I could fit it. • No engineer available I'm area for a considerable period of time - 8 weeks plus <p>When asked how often in a typical year you require the services of a supplier to remove the service cut-out fuse to allow you to work safely 36% of respondents noted between 1-5 times and 21% noted between 6-10 times. This shows 57% of our members require this service less than 10 times a year, with 19% requiring this service between 11-20 times, 6% between 21-30 times and 9% requiring it more than 30 times a year.</p> | |
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| | | <p>When asked how much time this takes to arrange with the supplier, it was interesting to note that 26% of respondents get the customers to make the arrangements to save them time, with 72% of respondents organising the service themselves. 21% noted that it takes more than 2 calls to make the arrangements with only 7% saying it was arranged through one call which was less than 15 minutes in length.</p> <p>The average wait for a supplier to arrange a visit to the site to remove the service fuse cut out varies massively. 32% of respondents noted it takes between 1-2 weeks, with 30% of respondents noting it takes between 2- 4 weeks. 13% of respondents reported a wait of beyond 4 weeks whilst 11% responded within 1 week.</p> <p>53% of respondents noted that wait times have been impacted by the Covid 19 pandemic.</p> <p>40% of respondents reported that the supplier does not charge for removing and replacing the service cut-out fuse for safe working, whilst 7% noted they are typically charged up to £50, 15% noting they are typically charged between £50-£75, 22% noting they are typically charged between £75-100 and 16% noting they are typically charged over £100. There is a huge disparity in the cost of this service.</p> <p>When asked whether the suppliers offer to install a double pole isolator when temporary isolation is requested, 51% of respondents said no, 14% said yes and 35% said sometimes.</p> <p>When we dug deeper to see if suppliers charge to install a double pole isolator if they are requested by the contractor to enable safe working, 12%</p> | |
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| | | <p>said no. 4% responded typically up to £50, 22% said they are charged between £50-£100 and 25% of respondents said they are typically charged more than £100.</p> <p>When asked if contractors have experienced suppliers fitting double pole isolation switches as standard during the Smart Meter roll out, 64% of respondents answered no, with 22% saying yes and 14% being unsure.</p> <p>50% of respondents noted they had been undercut on a job due to an electrician removing the fuse illegally themselves rather than following the correct route, with 34% of respondents being unsure whether that has happened.</p> <p>97% of respondents have come across a cut-out fuse which has not been sealed with 37% saying they come across this up to 10 times a year, 26% of respondents reporting this happens between 11-20 times a year and 12% noting they find unsealed cut out fuses over 50 times a year.</p> <p>Finally, when asked what the contractor would do if they came across a cut-out fuse which has not been sealed correctly, 32% of respondents reported they do a temporary fix and advise the homeowner to report to the supplier, 41% of respondents reported they make the consumer aware, leave it as it is and advise the homeowner to report to the supplier, 8% do a temporary fix and leave it and 20% do nothing.</p> <p>It is evident from our survey that the current situation is very confusing, disparate and causes a lot of frustration within the industry. Ownership of this role needs to be agreed between electricity suppliers and DNO's as a matter of urgency, and dedicated telephone numbers must be set up, with</p> | |
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| | | <p>colleagues who understand what is required when the removal and replacement of service cut-out fuses to enable safe working is requested. Multiple respondents to the survey were told to 'remove the seals', some via email, which completely contradicts the guidance and gives a very confusing message to the electrical contactor.</p> <p>We are pleased that this consultation is underway and shows that progress is being made. We urge this to be the first step to providing a clear, consistent and adoptable method of provide safe isolation to enhance safety.</p> <p>We would gladly meet with you to discuss the findings of our survey in more detail.</p> | |
| Certsure LLP | Non-confidential | We look forward to the implementation of the proposed safe isolations procedure which will help safeguard those working on electrical installations where complete isolation is required. | |
| EDF | Non-confidential | To summarise EDF would be fully supportive of this provided the timescale for implementation is reasonable and would not have a have a negative impact on our smart metering installation targets and also that we would be able to carry out this function for any customer regardless of supplier. | |
| ENWL | Non-confidential | This change proposal will implement much needed clarification for all DCUSA Parties, together with customers and their electricians, on responsibilities for isolations. It will assign a service level which means that electricians are able to deliver a practical and safe service to their customers. | |

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| NPg | Non-confidential | No | |
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| Ground Control Ltd | Non-confidential | <p>We are seeing an increased number of Energy Suppliers moving into the EV charging market. With Centrica, Octopus Energy, EDF and EON (to name a few) now offering domestic charge points directly to consumers. There is concern that the control of 2-pole isolator switch installations will provide energy suppliers with a competitive edge in this industry and if there is no change to regulations, this could result in anticompetitive practice, prohibiting third party installers from being able to compete in this market altogether. This in turn could result in taking out 260,000 personnel from the supply chain, reducing the rate at which the UK can transition to a sustainable economy.</p> <p>It is my recommendation that a suitable training programme, certification/accreditation and set of standards is acknowledged for fully qualified electricians to undertake the installation of 2-pole isolator switches under the new Retail Energy Code (REC) . It is critical that a clear set of standards are produced, ensuring accurate documentation is recorded of works carried out, along with regular audits and training courses provided by the appropriate professional bodies, therefore ensuring the commitment that is required to maintain the integrity of the network. This will undoubtedly result in a more cost efficient, environmentally friendly, and safer means of working. It will also help drive more sustainable technologies at pace across the UK, helping all to achieve their carbon sequestration targets over the coming years.</p> | |

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| WPD | Non-confidential | As mentioned in the answer to Q3, how is the change going to be applied to housing associations or multiple dwellings all requiring isolation work but multiple different suppliers being involved. | |
| SSE Energy Supply Limited | Non-confidential | No. | |
| BUUK | Non-confidential | None. | |
| Association of Meter Operators (AMO) | Non-confidential | <p>We believe this proposal is flawed for the following reasons:</p> <ul style="list-style-type: none"> • The use of the 500k consumer unit replacements does not correlate to this proposal and is therefore misleading. • There have not been any metrics provided by the DNOs to justify this proposal • As far as we can ascertain only one DNO undertakes this work and they do so via a commercial agreement with the consumer. The remaining DNOs explicitly state on their websites that they do not undertake the work • The proposal does not meet any of the DCUSA General Objectives. • The current arrangements allow for either the DNO or the Supplier to initiate the work. • We are not aware of any customer complaints regarding suppliers being unwilling to undertake this work. | |

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| | | <ul style="list-style-type: none"> We do not believe this proposal affords any benefit to energy consumers. <p>We would suggest that the DCUSA Panel reject the change due to it not meeting the DCUSA General Objectives.</p> <p>If the proposal does pass to Ofgem then we recommend it is rejected as an unnecessary change that would place increased burden on Suppliers and Meter Operators during a critical stage of SMIP.</p> | |
| UK Power Networks | Non-confidential | No | |
| ScottishPower Energy Retail Ltd | Non-confidential | <p>CP only attempts to resolve the issue for domestic customers – what about PC3-4, AMRs, HH etc?</p> <p>Believe customer journey process map has not been fully agreed so cannot comment on it.</p> <p>The CP has to include a communication strategy for electricians and customers and this should be at an industry level not per supplier / DNO to avoid mixed messaging.</p> | |
| Utilita Energy LTD | Non-confidential | We have no further comments | |
| British Gas | Non-confidential | (No entry) | |
| SP Energy Networks | Non-confidential | YES – The industry acknowledges a legacy issue of meter seals being cut and service terminations being worked on to provide isolation to customer | |

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| | | <p>electrical installation's and testing for decades. There have been millions of rewires and consumer unit changes carried out, with negligible reports of injury. The correct procedure to work safely needs formalised and communicated to ensure electrical contractors are trained and technically competent to risk assess service terminations, wear the correct PPE, seal up equipment, and report defects correctly. There is an unprecedented demand on resource with a general shortage of labour in the industry to intervene to the rate of change to combat climate change and reducing risk within customer homes.</p> | |
| Electrical Safety First | Non-confidential | <p>This long-awaited change will make a positive impact on safety by providing a clear route to providing temporary isolation of consumer premises for essential work such as replacing a consumer unit or installing an electric vehicle charge point. The introduction of legislation in the private rented sector has impacted on further increase in consumer unit replacements and the social housing sector is likely to follow, thereby adding to further consumer unit replacements. Additionally, the government commitment to roll out electric vehicles, together with decarbonising of heat and achieving net zero targets will almost certainly require temporary isolations, either as a direct result or due to additional remedial works required to facilitate the new technology. Both of those real and growing use cases are compelling arguments for supporting this change proposal. Failure to introduce the proposal will reflect badly on the sector, would be unfair on electricians, housing associations, landlords and consumers.</p> | |
| Working Group Conclusions: | | | |