

DCP 390 'Provision of Isolations for Safe Working on Customers' Electrical Installations'

COLLATED RFI RESPONSES

Company	Q1. What are your views on the proposed implementation plan for SLAs to come into effect as of 01 January 2023?	Working Group Comments
Centrica	<p>As stated in the previous consultation, we do not believe this proposal will benefit the customer, nor facilitate the DCUSA general obligations and that DCP 394 should be reviewed to determine if DCP 394 would be a better solution.</p> <p>We ask if it has been considered what impact this could have on resources abilities to complete the smart roll out programme and how this will interfere with the obligation of ARS to offer Smart meter installation.</p> <p>These SLAs are already monitored by NHHMOA audits and therefore there would be a duplication. There is also greater chance of point 5 volumes being higher upon agreement with a date with the customer suitable for the work to take place, therefore the reporting requirements would not be of use. In addition, if meter work is not carried out as planned, there are already reporting and compensation arrangements for customers as part of the Guaranteed Standards of Performance.</p>	<p>The potential for a conflict with The Electricity and Gas (Standards of Performance) (Suppliers) Regulations 2015 was highlighted. The Group has reviewed the Regulations in the context of the proposal and determined that, should the Regulations apply to this work:</p> <ul style="list-style-type: none">• The Regulations do not prescribe a time frame for attending, nor do they prescribe a time frame for making an appointment following receipt of a request. The latter requires that it be 'within a reasonable period' (Regulation 17).• Having received a request and made an appointment, the requirements of Regulation 17 would apply.

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ENWL	This does seem a reasonable approach to take as Supplier Parties have already advised that Meter Operator resources continue to be utilised on the smart meter rollout, so earlier implementation may have a detrimental impact on the smart meter rollout programme. This timescale should provide the opportunity to gauge a measure of the demand for the service and for additional resources to be put in place, if required.	Noted.
NPg	Agree.	Noted.
SSE Energy Supply Ltd.	SSE Energy Supply Limited holds the view that implementation in conjunction with the Smart Meter rollout would put MoPs under further pressure to meet SLA performance and Ofgem led programmes of work. Therefore, we do not agree with the implementation proposed as it would impact smart metering installation targets.	Noted.
Scottish Power Energy Retail	<p>An extraordinary DCUSA release has not been previously discussed and we do not believe this DCP meets to criteria for the additional release. We accept that, if this DCP was to progress we require more notice than the next release following Authority consent but believe a date has to be agreed by working group and full consultation. As stated in our response to the consultation we firmly believe this DCP does not resolve the issue of work being carried out without a supplier / DNO / MOPs knowledge.</p> <p>As stated previously, we do not agree with the SLAs as they are too restrictive. We also note that suppliers are already obligated under existing standards to provide appointments in a reasonable time, therefore, accepting a 10WD SLA is unnecessary and could create a double jeopardy situation.</p>	Noted.

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Total Energies Gas & Power Ltd.	<p>Since Pandemic, we have been experiencing issues with Siteworks and due to current backlogs in the field with third party agents, achieving the proposed timeframes might be easier in the domestic market as opposed to commercial. Agents currently take a minimum of ten working days to process the request before contacting customers to arrange site visits. Also, Smart rollout is having an impact on engineer resource.</p> <p>If the situation does not improve within meter operator resources, proposed SLAs will be challenging and will not be met.</p> <p>Is this Change Proposal sent to Meter Operators for review and their feedback?</p>	<p>The Working Group noted that the intent of this CP is to improve the performance being offered to Customers.</p> <p>The Working Group do not believe there are any risks of double jeopardy within the Guaranteed Standards of Performance Regulations as stated above.</p>
UKPN	<p>Whilst we expect the suppliers have a good handle on the volumes of this activity already – putting in place more robust and accessible processes and communicating these processes to the wider electrician's community may increase the volume of work. Making this reasonable endeavours for the next year will allow the development of the SLA reporting and tracking of volumes to ensure this is adequately resourced at the front end with clear processes and in the field.</p>	Noted.
Utilita	<p>As we laid out in our response to the recent consultation for DCP390, we are not supportive of the implementation of a 10 working-day service level agreement for the provision of isolations. Our main rationale for this view is:</p> <p>Large cost to suppliers – Suppliers will need to bare the cost of having enough engineering resource available to meet appointments at short notice.</p> <p>Limited benefits to customers – This solution still leaves some of the largest issues with the current process open; the customer will still be required to liaise with multiple parties, this is especially true of multiple residence buildings.</p>	Noted.

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	Due to these reasons, we are not able to support the implementation of this modification regardless of proposed implementation date.	
WPD	Yes, this sounds like an acceptable timescale if the change is introduced in February 2022.	Noted.

Company	Q2. Are you supportive of the new Clause in relation to the Supplier reporting quarterly on SLA performance? If not, please provide reasons.	Working Group Comments
Centrica	N/A – Completed v1.0 of response form.	Noted.
ENWL	We are supportive of this new reporting requirement.	Noted.
NPg	Yes.	Noted.
SSE Energy Supply Ltd.	<p>No.</p> <p>Appointments for de-energisation/re- energisation mainly come from our customers and we pass details/requests to MoPs.</p> <p>We send the job date of 10 working days however it will be up to the MoP if they can accommodate the job, if not they will contact the customer to arrange a suitable day.</p> <p>Therefore, in terms of monitoring this would require various external sources to provide data to collate, monitor and communicate back to the relevant regulatory body.</p>	Noted.

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Scottish Power Energy Retail	<p>As noted above, we already have reporting requirements on metering visits and believe this is duplication of effort. It is also not clear what purpose the reporting would serve as DCUSA does not have a performance assurance framework.</p> <p>We would recommend reporting, if required, is a requirement for both suppliers and DNOs as we do not accept that DNOs we refuse all requests.</p>	The Working Group noted that the Suppliers will have the relative data, the challenge is whether they are willing to make this public.
Total Energies Gas & Power Ltd.	Quarterly reporting from supplier on SLA performance can be shared.	Noted.
UKPN	Yes we are supportive of the principles of the new Clause and agree that there needs to be visibility of performance to support the accountability to deliver – the underlying issue is Safe Isolation hence there is an important obligation here on the Supplier to the Electrician community.	Noted.
Utilita	We are not supportive of the SLA being implemented. However, if an obligation is to be placed on any industry party is seems appropriate to report on party compliance to is.	Noted.
WPD	Yes.	Noted.

Company	Q3. Do you have any other comments on the legal text?	Working Group Comments
Centrica	We strongly recommend that this proposal is reviewed alongside DCP394 as a better solution.	Noted.

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ENWL	<p>There are references to clause 25.27 within clauses 25.37 and 25.38 for meeting requirements and delivery of services. The references to clause 25.27 should be replaced with reference to clause 25.34 as below:</p> <p>25.37 The obligation on the User is to make all reasonable endeavours to meet the requirements of clause 25.27 25.34 until 01 January 2023, after which date, the User Shall meet the requirements on 90% of occasions within each Quarter.</p> <p>25.38 The User shall submit a quarterly DCUSA SLA report summarising their performance for the delivery of services in 25.27 25.34.</p>	Noted.
NPg	No.	Noted.
SSE Energy Supply Ltd.	<p>Suggested re-wording of legal text.</p> <p>25.34 Subject to Clause [25.35] and unless otherwise agreed with the Customer, as a minimum, the User shall:</p> <p>(a) Carry out the De-energisation in normal working hours within 10 working days of the date of the request; and give a 4 hour attendance slot.</p> <p>(b) Carry out the Re-energisation in normal working hours within 10 working days of the date of the request; and give a 4 hour attendance slot.</p> <p>(c) Offer a service whereby the De-energisation and Re-energisation can take place on the same day.</p> <p>[25.35] The User shall use reasonable commercial efforts to offer services and/or carry out relevant works in accordance with Clause [25.34], taking into account the availability of, and services offered by, its appointed agents and contractors (including Meter Operator Agent(s)).</p>	Noted.

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	25.34. C – This would be driven by the service MOPs offer. If for example we de-energise on warrant, customer pays later the same day, the engineer may have left and is assigned another job, we have to make a new booking request, which in theory comes with another 10 working day lead time. Albeit MOPs will try to accommodate earlier appointments.	
Scottish Power Energy Retail	We would welcome the views of the DCUSA legal provider on how the obligations sit against Supplier obligations in Electricity and Gas (Standards of Performance) (Suppliers) Regulations 2015, Reg 3 as we believe much of the obligations in the DCP are not required and will simply cause duplication. As stated previously, it is not solving the issue and as such does not meet any DCUSA objective.	Noted.
Total Energies Gas & Power Ltd.	N/A	Noted.

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UKPN	<p>Some suggested tweaks to the wording to make the reporting criteria clearer</p> <ul style="list-style-type: none">- a) Number of requests received in the period (QTR)- b) Number of requests resolved within 10 working days- c) Number of requests agreed with customer outside 10 working days (before the 10 working days expires)- d) Number or requests not covered by B & C- e) Percentage of SLAs met ((b+c) / a) <p>Reporting should be enabled 10 working days after the close - which would in theory be by the end of the month following the end of the quarter.</p> <p>Separately – we believe that there is further scope after this is agreed, to add / change the legal text to allow suppliers to operate on behalf of a Building Owner, where they would require isolation of multiple different suppliers to fit isolators in the customer tails providing local isolation of the customer's equipment.</p>	Noted
Utilita	We have no further comments on the legal text.	Noted.
WPD	No, it now seems acceptable.	Noted.