




DCUSA Change Report		At what stage is this document in the process?
<h1>DCP 390</h1> <h2>Provision of Isolations for Safe Working on Customers' Electrical Installations</h2> <p><i>Date raised: 14 April 2021</i></p> <p><i>Proposer Name: Kevin Liddle</i></p> <p><i>Company Name: Northern Powergrid</i></p> <p><i>Company Category: DNO</i></p>		01 – Change Proposal
		02 – Consultation
		03 – Change Report
		04 – Change Declaration
Purpose of this 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.		
	This document is issued in accordance with Clause 11.20 of the DCUSA, and details DCP 390 – ‘Provision of Isolations for Safe Working on Customers’ Electrical Installations’.	
	Parties are invited to consider the proposed amendment (Attachment 1) and submit their votes using the Voting form (Attachment 2) to dcusa@electralink.co.uk by 03 December 2021 .	
	The voting process for the proposed variation and the timetable of the progression of the Change Proposal (CP) through the DCUSA Change Control Process is set out in this document. If you have any questions about this paper or the DCUSA Change Process, please contact the DCUSA by email to dcusa@electralink.co.uk or telephone 020 7432 3011	
	Impacted Parties: Supplier parties, DNO parties, IDNO parties	
	Impacted Clauses: Introduction of new Clauses 25.32 to 25.38	

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Any questions?

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Timetable

The timetable for the progression of the CP is as follows:

Change Proposal timetable

Activity	Date
Initial Assessment Report Approved by Panel	21 April 2021
Consultation issued to Parties	23 August 2021
Change Report approved by Panel	17 November 2021
Change Report issued for Voting	19 November 2021
Party Voting Ends	03 December 2021
Change Declaration issued to Authority	07 December 2021
Authority Decision	January 2022
Implementation	Next DCUSA release following Authority decision/ SLAs to come into effect from 30 June 2023

1 Executive 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.
- 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.

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.
- 1.8 The proposer holds the view that the Supplier manages 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.
- 1.10 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)
- 1.11 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.
- 1.12 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.
- 1.13 For the reasons given above, Network Operator parties believe the ultimate responsibility for providing a safe isolations service (de-energisation of supply) lies with Supplier parties and that

section 25 of DCUSA supports this. Network Operator parties therefore propose that the DCUSA legal text is made clearer to require Supplier parties to publish their safe isolations application process giving clear guidelines on the expected timescales in order to effectively manage customer expectations.

- 1.14 The DCUSA revised legal text will detail the minimum service levels for the safe isolations service and allow for Supplier parties 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.

2 Governance

Justification 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 the Distribution Network.

Requested Next Steps

- 2.2 The Panel considered that the Working Group have carried out the level of analysis required to enable Parties to understand the impact of the proposed amendment and to vote on DCP 390.
- 2.3 The DCUSA Panel recommends that this CP:
- Be issued to Parties for Voting.

3 Why Change?

Background of DCP 390

- 3.1 There are over half a million consumer unit replacements per year in the UK. Evidence suggests that the majority of these replacements occur without the Supplier being called to site to undertake an isolation. This is because, anecdotally, there's no clear process for how to obtain an isolation and if the service is offered it often has long lead times with inflexible time slots which are impractical in most situations. The poor service and lack of a clear process encourages the customer's electrician to take matters into their own hands, undertaking 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 the individuals involved will not necessarily have the training, equipment and awareness needed to manage the potential risks associated with Supplier and Distributor equipment; and could adversely affect the subsequent safety of the building and its occupants.

- 3.2 The working group acknowledges that these issues are on the rise due to 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. Having a clear and effective safe isolations process would help to discourage unauthorised, and potentially unsafe working.
- 3.3 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.
- 3.4 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.

4 Solution

- 4.1 The DCUSA Panel established a Working Group to assess DCP 390. This Working Group consists of DNO, Supplier, AMO, NAPIT and Electrical Safety First representatives. Meetings were held in open session and the minutes and papers of each meeting are available on the DCUSA website – www.dcusa.co.uk.
- 4.2 As stated above, the proposer holds the view that the Supplier manages 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 and that this is supported by section 25 of DCUSA. Clause 25.2 of DCUSA also sets out the circumstances where a supplier can request assistance from the DNO.
- 4.3 The proposer believes that 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.

DCP 390 Consultation

- 4.4 In order to develop the proposed solution further the DCP 390 Working Group issued a consultation to industry.
- 4.5 The consultation received 18 responses to the consultation comprising of five Suppliers, five DNOs, one IDNO, six other industry parties and one was submitted anonymously. The full response to the consultation and Working Group feedback can be found in Attachment 3. The responses are summarised below:

Q1: Do you understand the intent of DCP 390?

- 4.6 A majority of the respondents understood the intent of DCP 390, One respondent stated that they do not believe this CP would solve the issue of electricians pulling fuses or the issue in relation to multiple dwellings, where for example a landlord or local authority wishes to perform electrical

refurbishment to their properties. In this example, there may be multiple Suppliers involved and it is believed that this process would be much more efficient if one party was able to isolate the supply.

- 4.7 The Proposer was keen to state that the purpose of this CP is purely to define a process detailing how a customer can obtain timely main supply electrical isolations to allow for safe working on their electrical installations. This will provide clarity to those customers seeking these services. It was also noted that DCP 394 'Allow any REC Accredited Meter Operator to De-Energise any Metering Point' seeks to resolve the issue regarding multiple dwellings.

Q2: Are you supportive of the principles of DCP390?

- 4.8 A majority of the respondents stated that they were supportive of the principles of DCP 390.
- 4.9 Out of the five Supplier responses, two were supportive of the principles, although one stated that they do not believe it solves the issues outlined within the CP. A further two Suppliers were not supportive of this CP, however stated their support for DCP 394. Another Supplier stated that their 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.
- 4.10 Of the six other industry parties that responded, three were supportive of the principles of this CP. One respondent stated that whilst they see that this could benefit some consumers, they believe that there are much wider considerations that need to be factored in and addressed. Another respondent stated that they are supportive of the principles of ensuring safety and compliance within the industry but believe further steps are required. One respondent was not supportive of the principles of this CP.

Q3: 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.

- 4.11 There were varying views received from respondents to this question. We have summarised these view by party below:

DNO/ IDNO

- All Distributors that responded to the consultation believe that the Supplier is the responsible Party for providing isolations for safe working on customers' electrical installations.

Suppliers

- One respondent stated that they believe it should be both the Supplier and DNO responsible for safe isolations.
- One respondent stated that they were not sure if this change applies to non-domestic isolations also. They noted that they arrange appointments currently with MOp's for CT sites.
- One respondent stated that Clauses 25.1 and 25.2 already establish that suppliers are the responsible Party, and therefore do not believe that any change to the DCUSA document is required.

- One respondent stated that they believe the current obligation sits with DNOs or the appointed Meter Operator and that DCP394 would provide a better solution of isolation for consumers.
- Another respondent stated they do not believe this CP would actually stop the interference.

Other Industry Parties

- Of the other industry parties that responded three believe that the Supplier is the responsible party.
- Two respondents stated that they believe it is the DNO and customers responsibility.
- One respondent stated that they believe it should be a joint responsibility between Suppliers and DNOs.

Q4: 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

4.12 There were varying views received from respondents to this question. We have summarised these views by party below:

DNO/ IDNO

- A majority of Distributors that responded agreed that a 10 working day SLA was appropriate. One respondent stated that they believe 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 demand.

Supplier

- A common concern raised from Suppliers was resource capacity due to the smart meter rollout.
- One Supplier stated their 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 and another stated they would expect a date agreed between parties involved based on needs and resource availability.
- Another concern was in relation to remote areas, where meeting the 10 working day SLA may not be possible.

Other Industry Parties

- Of the other industry parties that responded three agreed that a 10 working day SLA was appropriate.
- One respondent suggested that the CP was withdrawn as they do not believe this CP addresses the issue. They stated resource concerns and believed that a wider review is needed, such as opening the criteria for who can perform safe isolations.
- One respondent stated that if this CP is approved, they believe the Clause should be to use reasonable endeavours to complete the installation within 20 working days or at a later time where agreed with the consumer.
- One respondent stated that they do not believe Suppliers have adequate resource to meet the proposed SLA.

Q5: 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.

4.13 There were varying views received from respondents to this question. We have summarised these views by party below:

DNO/ IDNO

- A majority of Distributors that responded agreed that if this CP is approved, it should be implemented in the next DCUSA release following Authority approval. It was acknowledged that Supplier feedback would need to be considered when agreeing to the implementation plan.
- One respondent disagreed and stated 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.

Supplier

- One respondent stated that they do not believe that the SLA should be implemented in conjunction of the smart meter rollout and that if the SLA was removed, they could support the CP.
- One respondent stated that at least 6 months' notice would be needed to ensure resourcing (and budgets) were increased. They also raised resource concerns and stated that efforts would need to be made at an industry level to ensure sufficient volumes of appropriately trained engineers are available to undertake these work activities.
- Another respondent stated that if an SLA of 10-working days was to be implemented, they would need a longer timeframe to ensure they have time to acquire the necessary resource to meet the new obligation.
- One respondent recommended the CP was withdrawn.

Other Industry Parties

- Of the other industry parties that responded three agreed that if this CP is approved, it should be implemented in the next DCUSA release following Authority approval.
- One respondent stated that if the proposal is accepted then they would suggest a sunset clause whereby the change would not come into force until 6 months after Ofgem have determined that the smart meter programme is complete.
- One respondent believes that a wider review is required.

Q6: Do you consider that the proposal better facilitates the DCUSA General Objectives?

If so, please detail which of the General Objectives you believe are better facilitated and provide supporting reasons.

If not, please provide supporting reasons

4.14 There were varying views received from respondents to this question. We have summarised these views by party below:

DNO/ IDNO

- A majority of Distributors that responded believe that this CP will better facilitate DCUSA General Objectives 2, 3 and 4.
- One respondent stated they believe the DCUSA General Objectives relating to the subject matter will be better served by increasing the resource pool within the private electrical contracting sector.

Suppliers

- One respondent stated that DCUSA General Objective 2 would be better facilitated as long as Suppliers are able to perform this function regardless of who supplies the customer.
- One respondent stated that they believe it may marginally better facilitate DCUSA General Objective 4 but they do not believe it will fully resolve the issue. Another also stated they do not believe this CP will address the issues.
- One respondent stated that they believe DCP 394 should be considered as an alternative solution.

Other Industry Parties

- Of the other industry parties that responded three agreed that this CP would better facilitate the DCUSA General Objectives.
- One respondent stated that whilst they considered this a positive step in improving industry operating procedures and best practice, they 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. They recommend an electrician scheme, allowing competent electricians to pull fuses, would be the best way to address the issue.
- One respondent stated that whilst the proposal may appear to facilitate the current DCUSA Objectives, it does not facilitate the needs of parties wider than the current DCUSA Parties. Another stated they do not believe it better facilitates the objectives.

Q7: Are you aware of any wider industry developments that may impact upon or be impacted by this CP?

- 4.15 A number of respondents mentioned **DCP 394 'Allow any REC Accredited Meter Operator to De-Energise any Metering Point'**. It was noted that allowing Meter Operators to de-energise any Metering Point regardless of whether they are appointed to that Supplier would be beneficial, particular in relation to multiple dwellings where there may be multiple Suppliers involved.
- 4.16 Some respondents expressed their support for a wider pool of competent people to undertake isolations, such as an electrician scheme.

Q8: Do you have any comments on the proposed legal text?

- 4.17 The Working Group agreed to review the legal text based on decisions made in relation to SLAs and implementation plan.

Q9: Any other comments?

- 4.18 Some respondents reiterated their desire to see an electrician scheme put in place.
- 4.19 NAPIT informed the Working Group that in July 2021 they undertook a survey of their members to ascertain the impact of the current situation regarding requesting the removal of service cut-out fuses to enable safe working. They received responses from 602 organisations and the results of this survey can be found in Attachment 5.
- 4.20 The Working Group acknowledged the varying views that came from the consultation responses. A majority of the Working Group members were comfortable with the proposed approach within the consultation, although others expressed concerns regarding the SLA and implementation plan and one member was not supportive of the proposed solution.

Proposed SLA and Implantation Plan

- 4.21 The Working Group acknowledged the concerns raised from Suppliers in relation to the proposed SLA and resource constraints due to the smart meter programme. The Proposer was keen to maintain an SLA as it is believed that this is a key component to offering an effective service to customers. It was noted that within the consultation some respondents stated that if an SLA was enforced that a suitable lead time would be required.
- 4.22 After discussion, the Working Group agreed that if this CP was approved the SLA would not become mandatory until 01 January 2023. Up to that date the Supplier should use reasonable endeavours to meet the SLA.
- 4.23 The Proposer discussed whether there should be a reporting mechanism in place so that Suppliers are obligated to report on their SLA performance. At this stage the Working Group agreed that as this would be an additional requirement not previously consulted on that it may be beneficial to issue an RFI to Distributors and Suppliers. It was also noted that this would be beneficial in relation to the new proposed implementation plan.

RFI

- 4.24 The full response to the RFI and Working Group feedback can be found in Attachment 4. The responses are summarised below:

Q1: What are your views on the proposed implementation plan for SLAs to come into effect as of 01 January 2023?

- 4.25 There were varying views received from respondents to this question. We have summarised these views by party below:

DNO

- All DNO respondents were satisfied that an implementation of 01 January 2023 for the mandatory SLA was a reasonable timeframe. It was acknowledged that during this time other

industry changes such as DCP 394 and an electrician scheme could be progressed which would help reduce the number of safe isolation requests coming through to Suppliers.

Supplier

- One respondent reiterated their consultation response that they believe DCP 394 should be considered as an alternative solution.
- One respondent believes that the SLA should not be mandatory in conjunction with the smart meter rollout.
- One respondent noted 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.
- One respondent stated that since Pandemic, they 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.
- One respondent expressed concerns regarding the challenge that Suppliers would face in relation to the additional resourcing required to meet customer demand.

Q2: Are you supportive of the new Clause in relation to the Supplier reporting quarterly on SLA performance? If not, please provide reasons.

4.26 There were varying views received from respondents to this question. We have summarised these views by party below:

DNO

- All DNO Parties were in agreement with the proposal to report on SLA performance.

Suppliers

- One respondent stated that they are not supportive of the SLA being implemented but if an obligation is to be placed on any industry party it would seem appropriate to report on party compliance.
- One respondent noted that in terms of monitoring this would require various external sources to provide data to collate, monitor and communicate back to the relevant regulatory body.
- One respondent stated that they already have reporting requirements on metering visits and believe this is duplication of effort.

Q3: Do you have any other comments on the legal text?

4.27 One respondent questioned 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.

Working Group Conclusions and next steps

4.28 The Working Group identified a number of areas of further work having discussed the parties' responses to the first consultation and the RFI:

- Review potential conflict with The Electricity and Gas (Standards of Performance) (Suppliers) Regulations 2015
- Agree appropriate SLA and Implementation plan
- Agree reporting matrix for SLAs
- Agree legal text (See Section 9)

Review potential conflict with The Electricity and Gas (Standards of Performance) (Suppliers) Regulations 2015

4.29 The potential for a conflict with The Electricity and Gas (Standards of Performance) (Suppliers) Regulations 2015 was highlighted by a respondent. The Group has reviewed the Regulations in the context of the proposal and determined that, should the Regulations apply to this work:

- 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.

Agree appropriate SLA and Implementation plan

4.30 The Working Group considered the responses received within the consultation and RFI. Whilst it is acknowledged that the smart meter programme is resource intensive, it is also believed that safe isolations is an essential activity to ensure safe working. After consideration, a majority of the Working Group concluded that if this CP is approved, the proposed SLA should become mandatory as of 30 June 2023. Up until this time the Supplier should make reasonable endeavours to meet the SLA.

4.31 It is believed that this will give a reasonable amount of time for Suppliers to prepare and resource appropriately. Members of the Working Group were also keen to note that between now and 30 June 2023, DCP 394 will have also been sent to the Authority for approval. There will also be sufficient time for a DCUSA Party to raise a change seeking to implement an electrician scheme. Both of these changes may result in a Supplier only providing the services for safe isolations as a last resort when all other parties choose not to do so.

Agree reporting matrix for SLAs

4.32 The Working Group considered the reporting requirements for the SLAs. After review, a majority of the Working Group agreed that reporting on SLA performance would be appropriate. Within the proposed legal text, the following requirements are placed on the Supplier:

25.34 Unless otherwise agreed with the Customer, as a minimum, the User shall:

- (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.
- (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.
- (c) Offer a service whereby the De-energisation and Re-energisation can take place on the same day.

4.33 It is therefore suggested that the Supplier should report quarterly on the following:

- A. Number of 25.34 (a) requests received in quarter
- B. Number of 25.34 (b) requests received in quarter
- C. Number of 25.34 (a & b) requests resolved within 10 Working Days
- D. Number of 25.34 (a & b) requests agreed with customer outside 10 working days (agreed before the 10 working days expires)
- E. Number of 25.34 (a & b) requests not Covered by C & D
- F. Percentage of SLAs met:

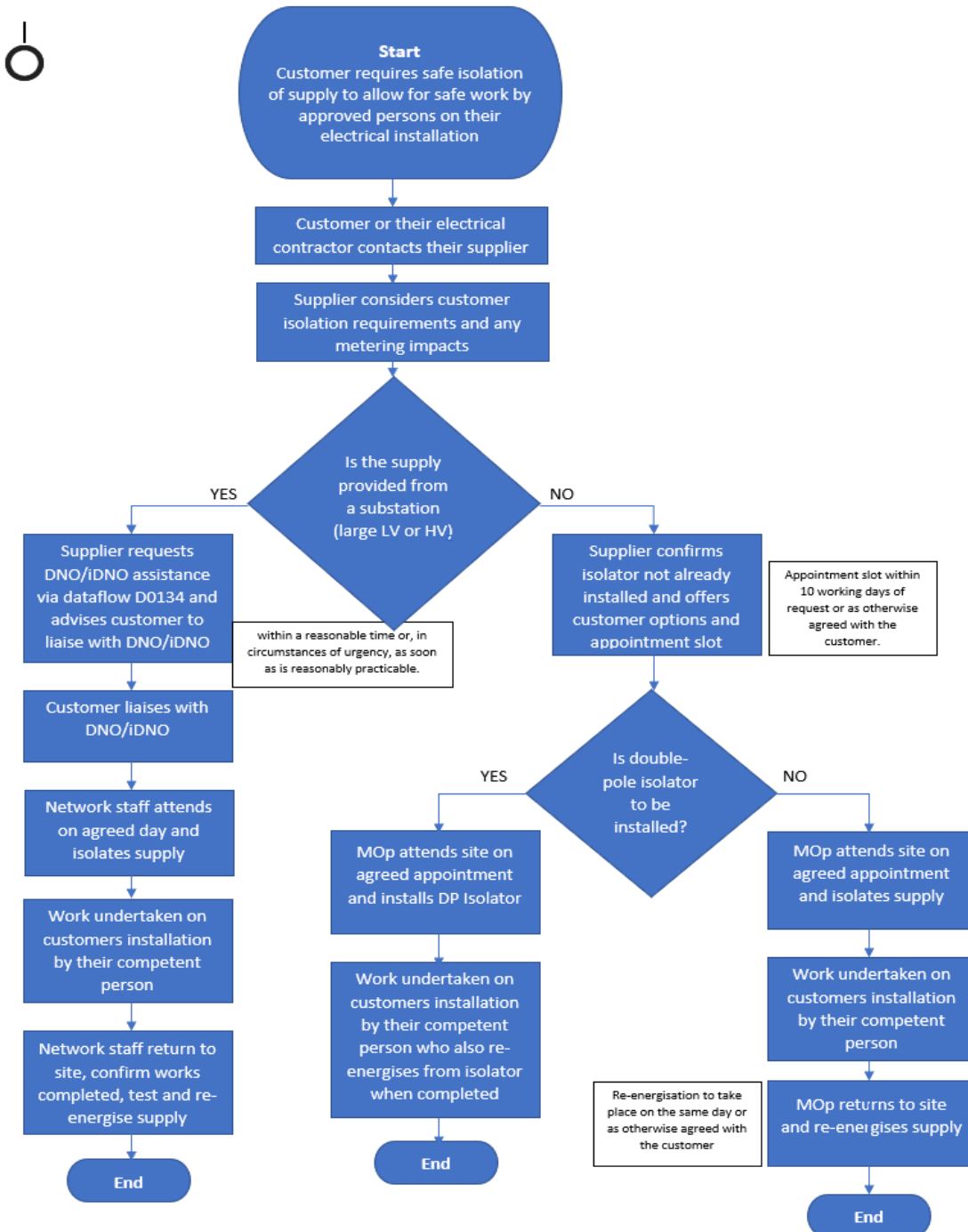
$$((A+B-E)/(A+B)) \times 100 \text{ Or } ((C+D)/(A+B)) \times 100$$

4.34 The proposed Supplier Reporting Requirements template can be found in Attachment 6

Final Proposed Solution

Expected Customer Journey

- 4.35 A high-level process map detailing the proposed process for a customer obtaining a safe isolation is detailed below:



4.36 It is proposed that if this CP is implemented all Suppliers will be required to publish their process for providing isolations for safe working on customers' electrical installations. This should be published on their website.

4.37 The first stage of the process will be for the customer, or their appointed electrical contractor, to contact the appointed Supplier. At this stage it will need to be established if the supply is being provided from a substation (HV supply or large LV supply). These types of supplies are generally to non-domestic customers. If this is the case the Supplier sends a flow to the Distributor (D0134) and in some cases the customer may be advised to liaise directly with the relevant Distributor from

that point on. The timescale for Distributor response is already detailed within DCUSA under Clause 25.2.

- 4.38 If the supply is not a high voltage supply or a large LV supply provided from a substation, then the Supplier is responsible for providing the service without the assistance of the Distributor. During the next part of the process the Supplier advises on the options available to the customer, which would include the possibility of a double-pole isolator being installed to for de-energisation and then subsequent re-energisation of supply.

SLAs and Implementation

- 4.39 At the next stage of the process the Supplier should agree an appointment date with the customer. The appointment date should be within 10 working days of the request, unless otherwise agreed with the customer (or their electrical contractor). If an isolator is not being installed, then re-energisation should take place on the same day, unless otherwise agreed with the customer.
- 4.40 The Working Group acknowledged that it would be unrealistic to expect the SLA to be met 100% of the time and therefore within the legal text the requirement is that the SLA will be met 90% of the time and this will be demonstrated via the reporting matrix.

5 Code Specific Matters

Reference Documents

- 5.1 None

6 Relevant Objectives

Assessment Against the DCUSA Objectives

- 6.1 For a DCUSA Change Proposal to be approved it must be demonstrated that it better facilitates the DCUSA Objectives. There are five General Objectives and six Charging Objectives. The full list of objectives is documented in the DCUSA.
- 6.2 A majority of the Working Group considers that the following DCUSA Objectives are better facilitated by DCP 390. One member does not believe this change better facilitates the DCUSA.

DCUSA General Objectives	Identified impact
<input checked="" type="checkbox"/> 1 The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks	None
<input checked="" type="checkbox"/> 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

<input checked="" type="checkbox"/> 3 The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences	Positive
<input type="checkbox"/> 4 The promotion of efficiency in the implementation and administration of the DCUSA	Positive
<input type="checkbox"/> 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
<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. The change does this because it removes confusion and uncertainty of scope and makes clear which party is obliged to deliver the service.</p> <p>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 and will stop network parties being diverted from undertaking their own obligations.</p> <p>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.</p>	

7 Impacts & Other Considerations

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

7.1 N/A

Does this Change Proposal Impact Other Codes?

- | | |
|-----------|-------------------------------------|
| BSC | <input type="checkbox"/> |
| CUSC | <input type="checkbox"/> |
| Grid Code | <input type="checkbox"/> |
| REC | <input checked="" type="checkbox"/> |
| SEC | <input type="checkbox"/> |

Other ☐
None ☒

Consumer Impacts

7.2 Enabling this change will define a clear process detailing how a customer can obtain timely main supply electrical isolations to allow for safe working on their electrical installations.

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.

7.4 Based on the consultation responses there seems to be an appetite to revisit the potential for an electrician scheme.

7.5 It should also be noted that [DCP 394 'Allow any REC Accredited Meter Operator to De-Energise any Metering Point'](#) seeks to widen the scope of DCUSA to allow any REC accredited meter operator to carry out deenergisation and re-energisation works.

Confidentiality

7.6 This Change is not confidential.

8 Implementation

Proposed Implementation Date

8.1 It is proposed that this CP should be implemented within the first DCUSA release after Authority approval. However, the SLA requirements will not become mandatory until 30 June 2023. This is articulated within the proposed legal text.

9 Legal Text

9.1 The proposed DCP 390 legal text seeks to clarify the following:

- Customer requests for De-energisation Works and Re-energisation Works are the responsibility of the Supplier to manage and satisfy
- The Supplier shall establish, maintain, and give effect to clear and transparent procedures by which the Customer can obtain a temporary De-energisation and subsequent Re-energisation to enable electrical work to take place on their installation and publish these details on their website

- Unless otherwise agreed with the Customer, as a minimum, the Supplier shall:
 - (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.
 - (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.
 - (c) Offer a service whereby the De-energisation and Re-energisation can take place on the same day.
- The obligation on the Supplier is to make all reasonable endeavours to meet the requirements of clause above until 30 June 2023, after which date, the Supplier shall meet the requirements on 90% of occasions within each Quarter.
- The Supplier shall submit a quarterly DCUSA SLA report summarising their performance for the delivery of services

9.2 The DCP 390 legal text acts as Attachment 1 to this Change Report.

10 Recommendations

Panel's Recommendation

- 10.1 The Panel approved this Change Report on 17 November 2021. The Panel considered that the Working Group had carried out the level of analysis required to enable Parties to understand the impact of the proposed amendment and to vote on DCP 390.
- 10.2 The Panel have recommended that this report is issued for Voting and DCUSA Parties should consider whether they wish to submit views regarding this Change Proposal.

11 Attachments

- Attachment 1: DCP 390 Legal Text
- Attachment 2: DCP 390 Voting Form
- Attachment 3: DCP 390 Consultation and Industry Responses
- Attachment 4: DCP 390 RFI and Industry Responses
- Attachment 5: NAPIT Survey Results
- Attachment 6: Supplier Reporting Requirements
- Attachment 7: DCP 390 Change Proposal