

DCP 394 Working Group Meeting 01

09 November 2021 at 10:00 - Web-Conference

Attendee	Company
Working Group Members	
Collette Baldwin [CB]	Gemserv
Dave Hill [DH]	Magnum Utilities
David Jones [DJ]	Alt Han Co.
Finn Davies-Clark [FDC]	SSE
Frank Bertie [FB]	NAPIT
Geoff Huckerby [GH]	Power Data Associates
George Barnes [GB]	Utilita
Irmeen Khan [IK]	Alt Han Co.
Justin Maltby-Smith [JMS]	NAPIT
Kevin Liddle [KL]	NPg
Kevin Woollard [KW]	Centrica
Lee Stone [LS]	EON
Martyn Allen [MA]	Electrical Safety First
Paul Abreu [PA]	Energy Networks Association (ENA)
Richard Brady [RB]	Western Power
Richard Hill [RH]	British Gas
Code Administrator	
Richard Colwill [RC] (Chair)	ElectraLink
Mel Kendal [MK] (Technical Secretariat)	ElectraLink

1. Administration

- 1.1 The Working Group reviewed the “Competition Law Guidance”. All Working Group members agreed to be bound by the Competition Law Guidance for the duration of the meeting.
- 1.2 There were no additional comments or feedback relating to the Working Group Terms of Reference.
- 1.3 Updates on all actions are provided in **Appendix A**.

2. Purpose of the Meeting

- 2.1 The Chair set out that the purpose of the meeting was to introduce a new Change Proposal (CP) into DCUSA and to determine the next steps to deliver this to the DCUSA Panel.

3. Overview of DCP 394 Change Proposal

- 3.1 SV provided an overview of the CP to the group.
- 3.2 The purpose of this CP is to widen the scope of DCUSA to allow any REC accredited Meter Operator to carry out de-energisation and re-energisation works.
- 3.3 KW explained that currently, Meter Operators are only allowed to work at metering points for which they are the appointed Meter Operator, except under certain circumstances.
- 3.4 KW reminded the group that DCP 304 ‘Metering Works by Non-Appointed Meter Operator’ was raised and implemented to help widen the scope of DCUSA to allow Suppliers and their Meter Operators, under certain scenarios, to break seals and work on metering equipment at metering points for which they are not the appointed meter operator, and this may be relevant to the discussions held for the current CP.
- 3.5 This CP would allow any accredited meter operator to carry out de-energisation and re-energisation work at any metering installation even if they are not working on behalf of an Electricity Supplier.
- 3.6 With the increase in demand for low carbon technologies and complexities in relation to multiple Suppliers within Multiple Dwelling Units (MDU) it is expected that this CP will help address some of these issues.
- 3.7 For the legal permissions and liabilities to work, the proposed solution is that Meter Operators would need to accede to DCUSA so they can establish the legal relationships with the DNOs and registered electricity Suppliers. Meter Operators would be liable for their own works in relation to de-energisation and re-energisation works.

4. Review and Discussion of Change Proposal

- 4.1 The Working Group both reviewed and further discussed the proposed Change Proposal following the provided overview.
- 4.2 The Working Group agreed that there is clearly a need for a service that will allow for such activities to be carried out and made available, and believe that DNOs will be supportive of this CP.

- 4.3 KW informed the group that a REC change will need to be carried out that will put an obligation on Meter Operators that would like to carry out independent works to accede to DCUSA and suggested that further changes to the current audits may need to be amended.
- 4.4 The Chair suggested creating a potential RFI to go out to Distributors, Suppliers and MOPs seeking their views on the legal stance, in relation to liability, prior to any formal Consultation.
- 4.5 One Working Group member queried whether Suppliers would need to be notified every time a Meter Operator carries out the works on a meter – it was suggested that Suppliers may need to be aware of these works being carried out as this could impact their Settlements. An action was taken to contact BSC in relation to this potential issue.
- 4.6 CB stated that a timetable will need to be created for this change to ensure this aligns with the REC changes that will be needed. CB also suggested that it needs to be clear within this change that this is only to allow Meter Operators to de-energise and re-energise meters and no further electrical meter works are to be carried out (the Supplier should be notified if any issues are found during this process).
- 4.7 PA mentioned that if this change is implemented, there may be a Commercial risk as MOPs would essentially be able to create their own market/workload as they will not be obligated to work with the Supplier only. This could potentially cause future resource issues for Suppliers if MOPs have plenty of their own works to carry out.
- 4.8 It is believed that this CP would discourage electricians from carrying out illegal activities as there would now be a timely intervention to carry out these works (as discussed in DCP 390 'Provision of Isolations for Safe Working on Customers' Electrical Installations').
- 4.9 The Chair suggested drawing out scenarios that could help draw out potential issues alongside an RFI seeking views on liabilities. The Working Group stated that the liability regime of what is currently in DCUSA would need to be provided and look at the implications of MOPs picking up these liabilities of working independently.

ACTION 01/01: Secretariat to draft an RFI to be circulated to Suppliers and MOPs seeking views on the liabilities of MOPs working independently.

ACTION 01/02: Secretariat to contact BSC in relation to potential issues with settlement.

- 4.10 The Working Group queried whether views are needed regarding whether allowing MOPs to work independently may cause limitations if they cannot afford the risk-level insurance for liabilities they will now be held accountable for – the Working Group agreed this will need to be considered and suggested involving Ofgem in these discussions.

ACTION 01/02: Secretariat to contact an Ofgem seeking representation for this CP and to seek guidance of any potential challenges around this change.

- 4.11 One Working Group member noted that Clause 53 would need to be amended to state that the MOPs who undertake their own works would be liable and not the Supplier (if the works are carried out independently).
- 4.12 The Chair suggested the next step would be to consider how the MOPs would accede to DCUSA – it was suggested looking at the Gas Supplier accession process may be suitable to consider, and the

Secretariat took an action to look into this further and potentially take this to the DCUSA Panel for early views on this.

ACTION 01/03: Secretariat to look at the Gas Supplier accession process to consider whether this would be suitable for the accession of MOPs.

4.13 The Working Group agreed that this CP and any potential REC changes would need to be in flight at the same time for the Authority to approve both together. It was also noted that the BSC would also need to be contacted regarding the potential consequences of this change.

ACTION 01/04: RC and CB to discuss offline aligning the timetables of this change with REC.

5. Scope of CP

5.1 The Working Group discussed what the scope of this CP should be in relation to MOPs and agreed the following:

DCP 394 – Scope
Limited to three phase whole current
Will include de-energisation / re-energisation / fitting Isolator Switch
No meter exchanges to be carried out independently – would have to be carried out in conjunction with Supplier
Obligation to report A/B/C Codes which may need a notification for every job
No SLAs will be mandated – purely Commercial
Consider ECOES access for MOPs functionality (as opposed to through their Supplier as access may be limited)

6. Any Other Business

6.1 The Chair asked the Working Group if there was any other business to discuss.

6.2 There were no other items of business raised.

7. Date of Next Meeting

7.1 The date of the next meeting has been scheduled for 22 November 2021 at 10am.

APPENDIX A

New and Open Actions

Action Ref.	Action	Owner	Update
01/01	Secretariat to draft an RFI to be circulated to Suppliers and MOPs seeking views on the liabilities of MOPs working independently.	ElectraLink	Ongoing.
01/02	Secretariat to contact an Ofgem seeking representation for this CP and to seek guidance of any potential challenges around this change.	ElectraLink	Ongoing.
01/03	Secretariat to look at the Gas Supplier accession process to consider whether this would be suitable for the accession of MOPs.	ElectraLink	Ongoing.
01/04	RC and CB to discuss offline aligning the timetables of this change with REC.	RC / CB	Ongoing.