

DCP 390:

Provision of Isolations for Safe Working on Customers' Electrical Installations

Date raised: 14 April 2021

Proposer Name: Kevin Liddle

Company Name: Northern Powergrid

Company Category: DNO

01 – Change Proposal

02 – Consultation

03 – Change Report

04 – Change Declaration

Purpose of Change Proposal:

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

| | |
|---|---|
|  | <p>This document is a Consultation issued to DCUSA Parties and any other interested parties in accordance with Clause 11.14 of the DCUSA seeking industry views on DCP 390 'Provision of Isolations for Safe Working on Customers' Electrical Installations'.</p> <p>The Working Group recommends that this Change Proposal should proceed to Consultation.</p> <p>Parties are invited to consider the questions set in section 10 and submit comments using the form attached as Attachment 1 to dcusa@electralink.co.uk by 14 September 2021.</p> <p>The Working Group will consider the consultation responses and determine the appropriate next steps for the progression of the Change Proposal (CP).</p> |
|  | <p>Impacted Parties: DNOs, IDNOs, Suppliers</p> |
|  | <p>Impacted Clauses: Introduction of new Clause</p> |

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Timetable

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

Change Proposal timetable

| Activity | Date |
|--|---|
| Initial Assessment Report | 21 April 2021 |
| Consultation Issued to Industry Participants | 23 August 2021 |
| Change Report Approved by Panel | 20 October 2021 |
| Change Report issued for Voting | 22 October 2021 |
| Party Voting Closes | 12 November 2021 |
| Change Declaration Issued to the Authority | 16 November 2021 |
| Authority Decision | 21 December 2021 |
| Implementation | Next DCUSA release following Authority decision |



Any questions?

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1 Summary

What?

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

In 1998 five key agreements were put in place to define responsibilities for domestic customer metering/service position issues.

- Use of System (UoS)
- Prepayment Meter Infrastructure Provision (PPMIP)
- Data Collection
- Data Aggregator
- Meter Operator (MOp)

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

- 1.10 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.
- 1.11 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. Network Operator parties therefore propose that the DCUSA legal text should be reviewed 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.
- 1.12 The DCUSA revised legal text should 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 for Part 1 and Part 2 Matter

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

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.

Question 1 Do you understand the intent of DCP390?

Question 2 Are you supportive of the principles of DCP390?

4 DCP 390 Working Group Assessment

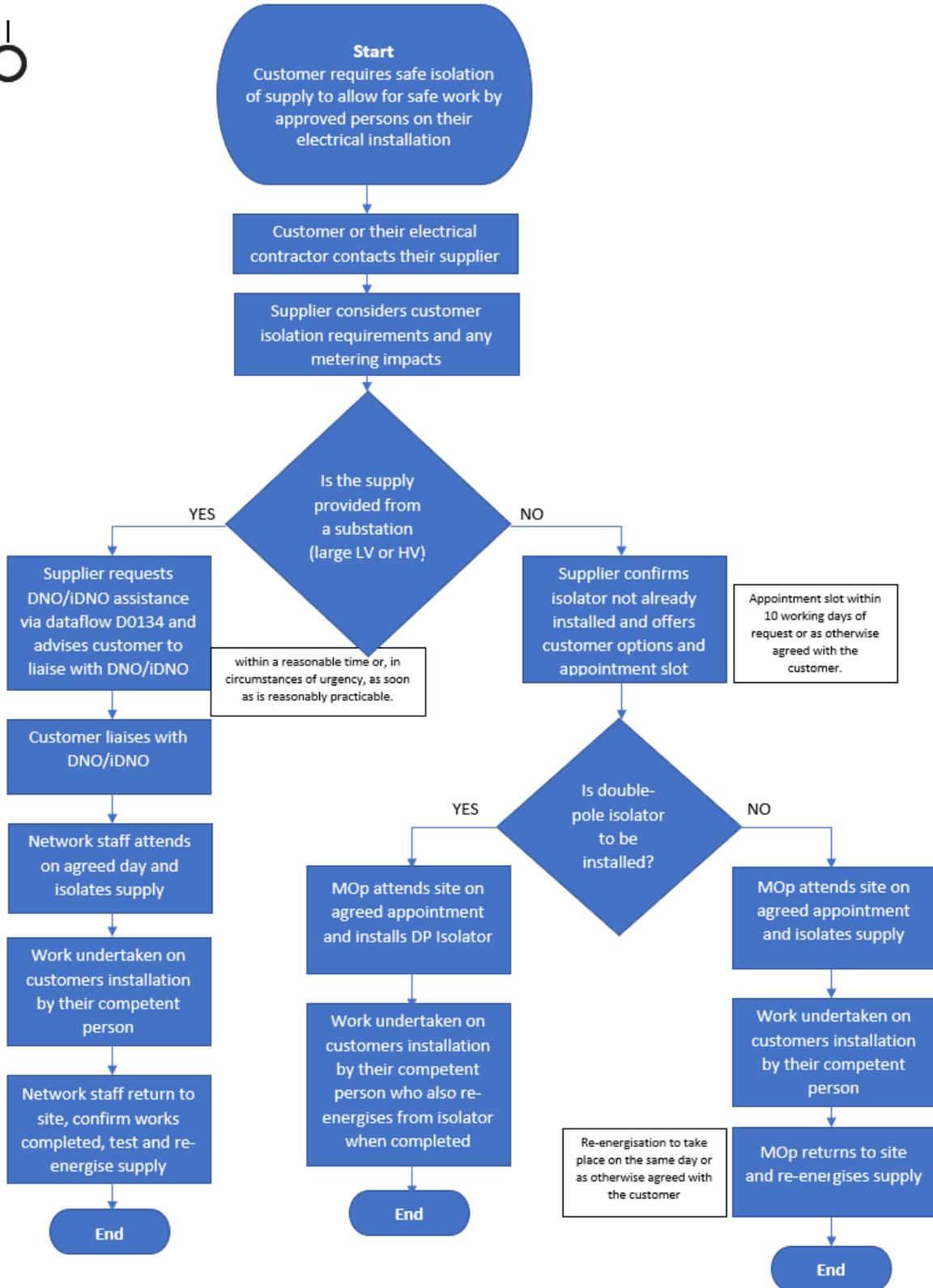
- 4.1 The DCUSA Panel established a Working Group to assess DCP 390. This Working Group consists of DNO, Supplier, AMO, NAPIT and Electrical Safety First representatives. Meetings were held in open session and the minutes and papers of each meeting are available on the DCUSA website – www.dcusa.co.uk.

- 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. 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.

Question 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.

Expected Customer Journey

- 4.4 The Working Group considered what the customer journey should look like regarding obtaining isolations for safe working on their electrical installations.
- 4.5 A high-level process map detailing the proposed process is provided below.



- 4.6 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. It will be for Supplier parties to decide how best to do that, and some may choose to publish the process details on their website.
- 4.7 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.
- 4.8 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.

Timescales

- 4.9 At the next stage of the process the Supplier should agree an appointment date with the customer. The proposer considers that this appointment date should be within 10 working days of the request, unless otherwise agreed with the customer (or their electrical contractor). The proposer also suggests that if an isolator is not being installed, then re-energisation should take place on the same day, unless otherwise agreed with the customer.
- 4.10 The Working Group is keen to seek views on the proposed timescales. Do you believe that a 10-working day service level, from the date of the request, is appropriate? If not, please provide your rationale for any alternative proposal. The proposer also believes that if this CP is approved, it should be implemented in the next DCUSA release following Authority approval. Do you agree with this proposed implementation timescale? If not, please provide your rationale and details of any alternative implementation arrangements.

Question 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.

Question 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.

5 Assessment Against the DCUSA Objectives

5.1 For a DCUSA CP to be approved it must be demonstrated that it better facilitates the DCUSA Objectives. There are five General Objectives and six Charging Objectives. DCP 390 will be measured against the DCUSA General Objectives, which are set out in the table below:

| 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 |

Objective 2: The facilitation of effective competition in the generation and supply of electricity and (so far as is consistent therewith) the promotion of such competition in the sale, distribution and purchase of electricity. The change does this because it removes confusion and uncertainty of scope and makes clear which party is obliged to deliver the service.

Objective 3 The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences. The change does this because it removes confusion and uncertainty of scope and makes clear which party is obliged to deliver the service and will stop network parties being diverted from undertaking their own obligations.

Objective 4 The promotion of efficiency in the implementation and administration of the DCUSA. The change does this because it removes confusion and uncertainty of scope and makes clear which party is obliged to deliver the service and minimises delays and time wasted trying to meet customer expectations when parties are unclear/uncertain that they have ultimate responsibility to deliver the service to their customers.

Question 6: 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.

6 Impacts & Other Considerations

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

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

6.2 N/A

Does this Change Proposal Impact Other Codes?

BSC

CUSC

- | | |
|-----------|-------------------------------------|
| Grid Code | <input type="checkbox"/> |
| MRA | <input type="checkbox"/> |
| SEC | <input type="checkbox"/> |
| Other | <input type="checkbox"/> |
| None | <input checked="" type="checkbox"/> |

Consideration of Wider Industry Impacts

6.3 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.

QUESTION 7: Are you aware of any wider industry developments that may impact upon or be impacted by this CP?

Confidentiality

6.4 This Change is not confidential.

7 Implementation

7.1 It is proposed that this CP should be implemented within the first DCUSA release after Authority approval. Please see question 5 for opportunity to provide comments.

8 Legal Text

8.1 The proposed legal text can be found in attachment 2.

Question 8: Do you have any comments on the proposed legal text?

9 Code Specific Matters

Reference Documents

9.1 Not applicable.

10 Consultation Questions

10.1 The Working Group is seeking industry views on the following consultation questions:

| No. | Questions |
|-----|---|
| 1 | Do you understand the intent of DCP390? |
| 2 | Are you supportive of the principles of DCP390? |
| 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. |
| 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. |
| 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. |
| 6 | 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. |
| 7 | Are you aware of any wider industry developments that may impact upon or be impacted by this CP? |
| 8 | Do you have any comments on the proposed legal text? |
| 9 | Any other comments? |

10.2 Responses should be submitted using Attachment 1 to dcusa@electralink.co.uk no later than, **14 September 2021**.

10.3 Responses, or any part thereof, can be provided in confidence. Parties are asked to clearly indicate any parts of a response that are to be treated confidentially.

11 Attachments

- Attachment 1: DCP 390 Consultation Response Form
- Attachment 2: DCP 390 Draft Legal Text
- Attachment 3: DCP 390 Change Proposal Form