

DCP 394 Working Group Meeting 07

31 March 2022 at 10:00 - Web-Conference

Attendee	Company
Working Group Members	
Boz Laird-Clowes [BLC]	BEIS
Charlotte Lee [CL]	NAPIT
Colette Baldwin [CB]	Gemserv
David Jones [DJ]	Alt Han Co.
Finn Davies-Clark [FDC]	SSE
Geoff Huckerby [GH]	Power Data Associates
George Barnes [GB]	Utilita
Jonathan Elliott [JE]	Certsure
Kevin Liddle [KL]	NPg
Kevin Woollard [KW]	Centrica
Lee Stone [LS]	EON
Paul Abreu [PA]	Energy Networks Association (ENA)
Paul Morris [PM]	UK Power Networks
Paul Norman [PN]	A Coole Electrical
Richard Brady [RB]	Western Power
Richard Hill [RH]	British Gas
Scott McLaughlin [SM]	Scottish Power Energy Networks
Warren Lacey [WL]	NPg
Code Administrator	
Richard Colwill [RC] (Chair)	ElectraLink
Hannah Proffitt [HP] (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 The group reviewed the minutes from the previous meeting held on 11 March 2022. Members approved the minutes as a fair and accurate representation of events. The final version of the minutes can be found as **Attachment 1**.
- 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 review the Actions, Tasks and Considerations Log, to review the first draft of the legal text, and to consider the timescales for the consultation.

3. Review Actions, Tasks and Considerations Log

- 3.1 The Working Group reviewed the log, an updated version can be found as **Attachment 2**.
- 3.2 The Chair advised that the scope of works and the merging of the requirements of DCP 390 into DCP 394 had both been agreed. The Chair noted that the first draft of the legal text had been circulated ahead of the meeting and would be reviewed under agenda item 4.
- 3.3 Regarding the possibility of an alternative Supplier led solution, PA noted that the DNOs felt it could make implementation easier, with the solution being more likely to gain support from all Parties. CB advised it may not lead to a quicker implementation and could create a bottleneck for requests as only the Supplier will be able to enact/provide a response.
- 3.4 PA suggested that the DNOs may feel the Supplier led option will be easier to implement, however that this doesn’t mean they will not support the original solution, although it may require more consideration in relation to liability between Parties.
- 3.5 One member raised concern that the original, non-Supplier led solution could lead to more SIPs entering the market. The Chair clarified that the legal text outlines that to become a SIP, Parties must first be a Retail Energy Code (REC) accredited Meter Equipment Manager. Another member also noted the importance of considering safety risks and liabilities.
- 3.6 Regarding the use of the wording “Safe Isolation Provider (SIP) of last resort” the group questioned this term and agreed a better way of articulating this is to state that DCP 394 should specify that the customers registered Supplier will meet safe isolation requirements when no SIP is available.

4. DCUSA Legal Text and Consultation Considerations

- 4.1 The Working Group reviewed the draft legal text and considered Gowlings comments. The Chair redlined the document and added comments in line with discussion. The redlined version can be found as **Attachment 3**.
- 4.2 The main points of discussion are below:

- Introduction – members asked where this sits in DCUSA. The existing DCUSA text can be found [here](#) (page 8 of DCUSA).
- Section 10.2 - the group agreed that SIP Parties should be able to raise a CP in relation to the specific clauses.
- Section 12.2 – the group agreed that SIP Parties should be able to vote on any CP relevant to the clauses.
- Section 52V.4 – the group discussed that a SIP can be asked to undertake work by parties such as Housing Associations or Local Authorities. The group agreed that something is needed stating that the SIP is responsible for ensuring Customers are aware of the works and that they have identified any vulnerable customers and agreed how to deal with this. The group added a comment questioning whether this sits better in REC.
- Section 52W.1 – the group discussed, and the Chair added a comment asking for clarity on part of this section. The group also discussed whether the energisation status needs to stay the same, i.e., if found de-energised, do not re-energise. The Working Group agreed that this is covered with the suggested new Clause 52W.6.
- Section 52N.5.2 – PA took an action to investigate the Distribution Code and how it may apply to SIP Parties.

07/01: PA to investigate the Distribution Code and how it may apply to SIP Parties

- Section 52W.8 – the group agreed that this section should be amended in line with the scope of works, to ensure it outlines that SIPs can tighten meter tails only. A member raised the possibility that SIPs not being able to move meters could cause operational issues. The group agreed that moving meters should be excluded from the scope for now, however that if it ends up causing issues it could be reassessed further down the line.
- Section 52X – the group agreed to add ‘and Electricity Supplier’ to the title.
- Section 52X.2 – the group questioned the drafting of this clause and suggested that it requires further review. The Chair agreed that once the provision of information has been mapped out, these clauses can be reviewed again.

- 4.3 CB suggested that if the group are considering consulting on both the original solution and the alternative Supplier-led solution, this will need to be aligned in REC too. The group discussed and agreed that although there may be advantages to the Supplier-led alternative, there are bigger advantages to the original, SIP led solution.
- 4.4 PA agreed to email the DNOs to advise them of this conclusion, and to ask them to raise any issues directly with the Chair. The Chair suggested that the draft legal text is included in the email, as it may be useful for the DNOs to circulate to their legal departments.

07/02: PA to email DNOs attaching the DCP 394 draft legal text and advising that the WG have concluded the original SIP led solution is preferable to the Supplier led alternative. DNOs to provide any feedback to RC.

Post Meeting Note

- 4.5 PA issued an email to DNOs on 31 March 2022. The Secretariat will provide an update on the above action prior to the next meeting.

5. Next Steps & Work Plan

- 5.1 The Working Group agreed that a further meeting will be required to develop the legal text before the consultation is issued. The group agreed that at the next meeting they will also consider the provision of information.

6. Any Other Business

- 6.1 The Chair asked the Working Group if there was any other business to discuss, to which nothing was raised.

7. Date of the Next Meeting

- 7.1 The next meeting will be held on 27 April 2022 between 10am and 1pm.

Attachments

- Attachment 1 - DCP 394 Working Group Meeting 06_Final Minutes v1.0
- Attachment 2 - Actions, Tasks and Considerations Log
- Attachment 3 - DCUSA Drafting for Meter Operators under DCUSA - Tracked

APPENDIX A

New and Open Actions

Action Ref.	Action	Owner	Update
04/04	Chair to consider when the DCP 394 consultation can be released, with consideration to REC modifications.	Chair	Ongoing.
04/05	Secretariat to draft a consultation document for review at the next Working Group.	Secretariat	Ongoing.
07/01	PA to investigate the Distribution Code and how it may apply to SIP Parties	PA	New action.
07/02	PA to email DNOs attaching the DCP 394 draft legal text and advising that the WG have concluded the original SIP led solution is preferable to the Supplier led alternative. DNOs to provide any feedback to RC.	PA	New action.

Closed Actions

Action Ref.	Action	Owner	Update
01/05	PA to feedback discussions to the Proposer of DCP 390 to enable a decision on the way forward	PA	Action closed. DCP 390 to be merged into DCP 394.
06/01	Produce draft legal text in relation to SIP of last resort obligations.	ElectraLink	Action closed. Legal text reviewed during the meeting.

07/01	Produce draft legal text in relation to SIP of last resort obligations.	ElectraLink	Action closed. Legal text reviewed during the meeting.
07/02	Members to review the DCP 394 Action/ Task/ Consideration Log and provide feedback/ additions if necessary.	All	Action closed. Reviewed during the meeting.