

DCP 394 Working Group Meeting 09

24 May 2022 at 13:00 - Web-Conference

Attendee	Company
Working Group Members	
Boz Laird-Clowes [BLC]	BEIS
Colette Baldwin [CB]	Gemserv
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.
Kevin Liddle [KL]	NPg
Kevin Woollard [KW]	Centrica
Paul Abreu [PA]	Energy Networks Association (ENA)
Paul Morris [PM]	UKPN
Paul Norman [PN]	A Coole Electrical
Richard Brady [RB]	Western Power
Richard Hill [RH]	British Gas
Warren Lacey [WL]	NPg
Code Administrator	
Richard Colwill [RC] (Chair)	ElectraLink
Hannah Proffitt [HP] (Technical Secretariat)	ElectraLink
Apologies	
Scott McLaughlin [SM]	Scottish Power Energy Networks

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 Updates on all actions are provided in **Appendix A**.
- 1.3 The group reviewed the minutes from the previous meeting held on 31 March 2022. Members approved the minutes as a fair and accurate representation of events. These can be found as **Attachment 1**.

2. Purpose of the Meeting

- 2.1 The Chair set out that the purpose of the meeting was to consider the final aspects of the legal text and to consider the consultation and next steps.

3. Provision of Information – RFI Responses

- 3.1 CB advised that they are still working to consolidate the Request for Information (RFI) responses. CB agreed to provide an update when possible.

4. Review of Updated Draft Legal Text

- 4.1 The Chair presented the current version of the legal text to members and highlighted the amendments since the previous meeting.

Definition of Safe Isolation Works

- 4.2 The Chair highlighted that the definition of Safe Isolation Works has been included in the text as agreed at the last meeting.

Safe Isolations Provider Voting Rights

- 4.3 The Chair highlighted that clause 10.2.1 currently excludes SIP Parties from raising and voting on Change Proposals (CPs).
- 4.4 KW questioned why they are excluded. CB agreed noting that if SIPs have obligations under the DCUSA, they should be able to raise CPs concerning the areas that are applicable to them.
- 4.5 PA suggested that if a SIP wanted to, they could raise a CP through a Supplier, however a majority of the Working Group were comfortable that a SIP should have the ability to vote on the relevant clauses.
- 4.6 The group discussed and agreed that the text should be amended to allow SIPs to raise and vote on Changes related to section 2G, and to include a question in the consultation asking if Parties agree. The Chair agreed to raise this with the Panel and with the DCUSA legal advisers to seek more details on how this should be done.

09/01: The Chair to refer to the DCUSA Panel and the DCUSA legal advisers on legal text amendments necessary to enable SIP Parties to raise CPs and vote on matters linked to section 2G.

Works Undertaken by the Safe Isolation Provider

- 4.7 Regarding section 52W.2, FDC questioned the use of the term ‘as soon as reasonably practicable’, raising concern that this is not specific enough and could lead to long waiting periods for re-energisation. The group considered amending this but agreed to keep it the same as this phrase is also used in other areas of the DCUSA when referring to re-energisation.

Provision of Information

- 4.8 The Chair highlighted the new clause 52X, noting that it deals with general reporting of issues to the Distributor and Supplier. The Chair suggested that the group consider including some or all of DCUSA section 30.5 (Dangerous Incidents and Damage) which is an existing requirement between Distributors and Suppliers, amending this to refer to the ‘SIP’ rather than ‘User’.
- 4.9 WL asked whether the data flows can be amended to accommodate the Change. CB confirmed that the Retail Energy Code (REC) have discussed this with the technical architecture team and that SIP will need to be introduced as a new role code for sending flows. CB noted that scenario variants of the flows will need to be created to allow SIPs to send flows to the various Parties as necessary. CB advised that they are currently assessing the impacts and how long it will take to implement.
- 4.10 WL highlighted the Service Level Agreements (SLAs) outlined in section 30.5 and noted that these SLAs are based on smart meter installation forecasts and therefore should not be mirrored for the Safe Isolation work.
- 4.11 PA noted these SLAs were put in place to encourage DNOs to respond within acceptable timescales and to not become a barrier in the smart meter programme. PA noted that these SLAs were funded to support the smart meter programme and suggested that DNOs may not support the Change if it introduces further SLAs for Safe Isolation work.
- 4.12 CB noted that if a SIP discovers an issue at a job, they are unable to resolve this and will be relying on the DNO or Supplier. CB suggested that the notifications sent by the SIP should be considered within the same timescales as any other notification.
- 4.13 PA noted that providing a Safe Isolation is a simple job and that there is unlikely to be many resulting category B notifications. KW agreed that reports will likely arise from a minority of cases and that many customers will have already had a smart meter installed and therefore any issues will have already been identified and fixed. KW noted that as the Proposer of the Change, they would support SLAs being excluded from the legal text.
- 4.14 PA highlighted that DNOs are more likely to support a best endeavours approach and that they have been doing this regarding customer/electrician enquiries with no complaints about timescales. WL agreed that the solution should be as simple as possible to aid the progression and implementation of the Change.
- 4.15 The group agreed for section 30.5 to be included in the legal text, excluding the SLA requirements. The group agreed that if necessary, SLAs could be introduced in future.

5. DCP 394 Consultation

5.1 This is discussed under agenda item 6.

6. Next Steps & Work Plan

6.1 The Chair agreed to update the legal text and consultation document following the meeting and these will be circulated to the Working Group prior to the next meeting.

6.2 The group agreed for a further meeting to be scheduled for 09 June 2022 to review the consultation ahead of it being issued on 10 June 2022.

7. Any Other Business

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

8. Date of Next Meeting

8.1 The date of the next meeting has been scheduled for 09 June 2022 at 10am. The purpose of this meeting will be to finalise the consultation document.

9. Any Other Business

9.1 There was no other business raised.

10. Attachments

- Attachment 1 - DCP 394 Working Group Meeting 08_Final Minutes v1.0

APPENDIX A

New and Open Actions

Action Ref.	Action	Owner	Update
04/05	Secretariat to draft a consultation document for review at the next Working Group.	Secretariat	Ongoing. <i>To be reviewed at the next meeting.</i>
07/01	PA to investigate the Distribution Code and how it may apply to SIP Parties	PA	Ongoing.
08/01	CB to refer to Gowling to ask whether requirements can be introduced into code for considering vulnerable customers before commissioning work.	CB	Ongoing.
09/01	The Chair to refer to the DCUSA Panel and the DCUSA legal advisers on enabling SIP Parties to raise CPs and vote on CPs concerning section 2G.	Chair	New action.

Closed Actions

Action Ref.	Action	Owner	Update
08/02	The Chair to update legal text based on meeting discussions and issue to members.	Chair	Action closed. <i>This was completed ahead of the meeting.</i>