DCUSA Consultation	At what stage is this document in the process?
# DCP 394: ## Allow any REC accredited meter operator to de-energise any metering point. *Date raised: 02 September 2021* *Proposer Name: Kevin Woollard* *Company Name: British Gas* *Company Category: Supplier*	01 – Change Proposal **02 – Consultation** 03 – Change Report 04 – Change Declaration

Style Definition: Heading 2,level 2,level2

Purpose of Change Proposal:

To widen the scope of DCUSA to allow any REC accredited meter operator to carry out de-energisation and re-energisation works.

	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 394 'Allow any REC accredited meter operator to de-energise any metering point'. The Working Group recommends that this Change Proposal should proceed to Consultation. 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 XX~~01~~ **July 2022.** The Working Group will consider the consultation responses and determine the appropriate next steps for the progression of the Change Proposal (CP).
	Impacted Parties: DNOs, IDNOs and Suppliers
	Impacted Clauses: Create new Clauses.

Contents

Timetable

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

Change Proposal timetable

Activity	Date
Initial Assessment Report	15 September 2021
Consultation Issued to Industry Participants	XX~~10~~ June 2022
Change Report Approved by Panel	17 August 2022
Change Report issued for Voting	19 August 2022
Party Voting Closes	09 September 2022
Change Declaration Issued to Parties	12 September 2022
Change Declaration Issued to Authority]	12 September 2022
Authority Decision	October 2022

Any questions?

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1 Summary

What?

1.1 To widen the scope of DCUSA to allow any Retail Energy Code (REC) accredited Meter Equipment Manager (MEM) to carry out De-energisation and Re-energisation works and if reasonably necessary adjust or replace the terminals of the meter at metering points at which they are not the appointed MEM. It should be noted that within DCUSA these parties are referred to as Meter Operator Agents (MOA). For the purposes of this document, we will refer to these parties as MEMs.

Commented [BRJ1]: Does the point of installing replacement meter tails need adding as in the scope

Commented [RC2R1]: Added

Why?

1.2 Where there is Proximate Metering Equipment in situ t~~T~~he current DCUSA arrangements only allow non-appointed Gas and Electricity Supplier's REC accredited MEMs to access the DNO/ IDNO main fuse and carry out the above work in certain limited circumstances. ~~These are W~~where the MEM ~~there is Proximate Metering Equipment in situ and the MEM~~ is working on behalf of a Gas or Electricity Supplier, in these circumstances, they may ~~o~~ carry out the following activities:

(a) minimal repositioning of the metering equipment relating to the Third Party Metering Point within a communal metering equipment space;

(b) work on looped neutral(s) on the metering equipment relating to the Third Party Metering Point;

(c) work on a shared supply used by the metering equipment relating to the Third Party Metering Point;

(d) Revenue Protection Activity relating to the Third Party Metering Point;

(e) installation of an isolator in respect of the metering equipment relating to the Third Party Metering Point; and/or

(f) installing, operating inspecting, maintaining, repairing, renewing, repositioning, replacing and/or removing a Smart Metering Comms Hub Device

1.3 In order to meet the challenges of Net Zero and facilitate the expected growth in installation of L~~l~~ow and Zero C~~c~~arbon T~~t~~echnologies (LZCT) the arrangements for allowing the activities mentioned in paragraph 1.1 need to change.

Commented [BRJ3]: Replace 'low carbon technologies' with Low and Zero Carbon Technology (LZCT) equipment

Commented [RC4R3]: Done

~~1.3~~1.4 It should also be noted that NAPIT 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 X.

How?

~~1.4~~1.5 The intention will be to amend DCUSA to provide the necessary legal permissions to allow any REC accredited MEM to carry out De-energisation and Re-energisation works and if reasonably necessary adjust the terminals of the meter at any metering installation when not working on behalf of a Gas or Electricity Supplier. For example, the MEM may be working on behalf of a Low and Zero Carbon Technology (LZCT) installer ~~n Electric Vehicle (EV) or heat pump installer~~ or under the direction of a local authority to carry out multiple dwelling refurbishments. In order to put in place the necessary legal permissions it is proposed to allow REC accredited MEMs to become party to the DCUSA to establish a direct legal relationship between MEMs, DNOs, IDNOs and Electricity Suppliers. This will allow them to access Distribution owned equipment and provide the required indemnities to the Distributor and Electricity Supplier.

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 386

3.1 It has become apparent over the last few years that tasks such as fitting of an isolator between the electricity meter and the consumer unit has been frustrated by the current rules which require the work to be undertaken on the instructions of the electricity Supplier appointed to that property or where the MEM is already appointed to that property. This has caused many issues where, for example, a local authority wishes to refurbish many dwellings but first needs the consent of the electricity Supplier.

3.2 There have been numerous complaints into the industry including Electrical Safety First and trade bodies such as ECA, NICEIC and Select. It is believed that there are many thousands of occasions where ~~a~~ unauthorised persons~~REC party~~ break~~s~~ specified seals on Distribution and Supplier owned equipment to complete their work. Whilst this is a breach of ESQCR there has been no enforcement as the industry has not been able to provide a simple solution that can be adopted by all stakeholders.

3.3 The installation of ~~EV chargers and other customer generation~~LZCT equipment and increased electrical inspection/rectification criteria being placed on landlords, has seen the number of unauthorised breaking of specified seals increase. With the uptake of LZCTs ~~EVs i~~Increasing year-on-year then it can be reasonably assumed that the associated unauthorised breaking of seals may~~will~~ also increase.

3.4 Within the industry there is a programme to enable Multiple Dwelling Units (MDUs) to engage with the smart metering installation programme. This will involve installing additional equipment in various MDU locations, it is feasible that in some of these locations it would be advantageous to install an isolator switch.

3.5 It should be noted that only REC accredited MEMs have the authority to break DNO/ IDNO seals and remove the main fuse. This proposed change maintains that requirement.

3.6 This issue has been recognised at the DCUSA Safe Isolations Working Group and previously agreed as an issue at the BEIS Smart Metering Operations Group (SMOG). The removal of specified seals and fuses by ~~non-authorised parties~~unauthorised persons is both a health and~~&~~ safety issue and a contravention of ESQCR. The proposed solution maintains the requirement for a party to be acceded to the REC as a MEM to undertake the activity but broadens who can instruct that party to undertake the work. As an example, a local authority or housing associate could contract with a REC accredited MEM ~~party~~ of their choice based on a commercial agreement.

3.7 This proposal maintains the integrity of ensuring that only REC accredited MEMs, ~~following the Meter Operator Code of Practice (MOCOP)~~ complying with REC obligations can undertake this work.

Question 1 Do you understand the intent of the CP?

Question 2 Are you supportive of the principles of the CP?

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Commented [BRJ5]: Replace with LZCT equipment

Commented [RC6R5]: Done

4 DCP 394 Working Group Assessment

4.1 The DCUSA Panel established a Working Group to assess DCP 394. This Working Group consists of DNO, Supplier, AMO, NAPIT, ENA, REC Code Manager 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, DCP 394 seeks to amend DCUSA to provide the necessary legal permissions to allow any REC accredited MEM to carry out De-energisation and Re-energisation works and if reasonably necessary adjust the terminals of the meter at any metering installation when not working on behalf of a~~n~~ Supplier. This would, for example, ~~-~~mean that they may be working on behalf of the premise owner or their appointed electrical contractor, but always with the consent of the building occupier. ~~an EV or heat pump installer or under the direction of a local authority.~~

4.3 At present, MEMs can only carry out this work when working on behalf of a Supplier. Therefore, the legal relationship is between the Supplier and Distributor, and this is set out within DCUSA.

4.4 If DCP 394 is approved, there will be occasions where the MEM is not working on behalf of a Supplier and therefore is working directly as a single entity. In these cases, a legal relationship will need to be established between the Distributor, Supplier and MEM. As stated above it is proposed that MEMs wishing to undertake this activity become party to the DCUSA to establish a direct legal relationship.

Scope of Works

4.5 The Working Group discussed the scope of work that a MEM should be able to undertake when acting as a ~~single entity~~Safe Isolation Provider (SIP). The Working Group believe the work should be limited to the following:

(a) De-energise that Entry/Exit Point;

(b) (if reasonably necessary) adjust the terminals of the meter and associated equipment and re-make the connection to them to make safe and remedy any disturbance of the connection that may have occurred

(c) ~~in performing the De-energisation; "(c);~~ If required, terminate replacement* customer tails into the Suppliers meter, customer tails having been presented and tested by electrical contractor as part of their works; and~~"~~

*~~-~~ only cables fitted for existing or DNO approved additional circuits with an appropriate test certificate will be accepted.

(d~~c~~) Re-energise that Entry/Exit Point.

4.6 The key aspect of this CP is to assist with the challenges of Net Zero and facilitate the expected growth in installation of LIZCTsow carbon technologies (LCTs). It is believed that by widening the scope of DCUSA to allow any REC accredited MEM to carry out the above works, when not working on behalf of a Supplier, (i.e, the MEM may be working on behalf of an EV or heat pump installer or under the direction of a local authority to carry out multiple dwelling refurbishments), will allow for installers of LZCTs to arrange isolations for safe working on customers' electrical installations in a more efficient and quicker manner.

Safe Isolation Provider (SIP)

4.7 The Working Group discussed the approach required in relation to MEMs acceding to DCUSA for the purposes of undertaking the above works, on any metering point as a single entity.

4.8 The definition of MEM within REC is as below:

> means, as applicable, either: (a) for electricity, the Meter Operator Agent (as defined in the BSC) Appointed by an Electricity Supplier; or (b) for gas, the Meter Asset Manager (as defined in the UNC) Appointed by the Gas Supplier

4.9 As the REC definition of MEM clearly states that they are appointed by an Electricity Supplier and for the purposes of the activities proposed under DCP 394 they would be acting as a single entity, the Working Group determined that a new industry role would need to be established and defined for this activity.

4.10 After consideration, the Working Group propose that any REC accredited MEM, wishing to undertake the activities outlined within this CP would need to accede to the DCUSA to become a Safe Isolation Provider (SIP). Acceding to DCUSA as a SIP would set up the necessary legal relationship between DNO, IDNO and Supplier Parties in relation to the SIP working on their assets.

4.11 Each reference to the SIP within DCUSA will be a reference to each Party that is a SIP Party separately and individually and, where an obligation is imposed on, or a right granted to, the SIP, that obligation will be imposed on, and that right granted to, each Party separately and independently. Further information regarding this legal relationship is detailed below.

New Section 2G of DCUSA

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4.12 It is proposed that there will be a new Section 2G added to DCUSA. This Section will set out the terms and conditions pursuant to which each DNO/ IDNO Party and each Supplier Party shall allow each SIP Party to undertake Safe Isolation Works.

4.13 This new Section will set out the following key points:

- Safe Isolation Works will be defined as below:

  > means, in respect of an Entry/Exit Point, works by a SIP Party to:

(a) De-energise that Entry/Exit Point;

(b) (if reasonably necessary) adjust the terminals of the meter and associated equipment and re-make the connection to them to make safe and remedy any disturbance of the connection that may have occurred ~~in performing the De-energisation~~; ; ~~and~~

(c) If required, terminate replacement* customer tails into the Suppliers meter, customer tails having been presented and tested by electrical contractor as part of their works; and

*only cables fitted for existing or DNO approved additional circuits with an appropriate test certificate will be accepted.

(d~~c~~) Re-energise that Entry/Exit Point.

- Work limited to Whole Current Metering only
- Any and all Safe Isolation Works carried out pursuant to Section 2G shall only be carried out by an individual working on behalf of the SIP and with the permission of the Customer.
- Section 2G will not imply any permission by the Customer, and will make clear that the works pursuant to Section 2G are not undertaken on behalf of the DNO, IDNO or the Electricity Supplier. The SIP must make clear to the Customer (and to the occupier if different) that the SIP is not acting on behalf of the DNO, IDNO or the Electricity Supplier.
- The SIP shall act in accordance with Good Industry Practice when carrying out, or procuring the carrying out of, any and all works pursuant to Section 2G.
- The SIP will only be entitled to exercise rights under Section 2G while it is an accredited MEM under the REC. The SIP shall comply with the Meter Operation Code of Practice in relation to the works undertaken pursuant to Section 2G.
- Section 2G will state that if the SIP wishes at any time to undertake Safe Isolation Works, consent is given from DNO, IDNO and Supplier Parties provided that the SIP Re-energises that Exit Point and/or Entry Point as soon as reasonably practicable thereafter.
- Section 2G will state the SIP shall only be entitled to Re-energise an Exit Point and/or Entry Point that has been De-energised by (or on behalf of) the SIP pursuant to Section 2G (i.e. if found De-energised then no Safe Isolation Work will be allowed~~would be undertaken~~).
- Section 2G will state that DNO, IDNO and Supplier Parties consent to the SIP interfering with their equipment to the extent it is necessary to do so in exercising the SIP's rights, or complying with its obligations, under Section 2G. The SIP shall not otherwise interfere with their equipment.
- Provision of information (detailed further below)
- A liability clause (detailed further below)

Provision of Information to DNO, IDNO and Electricity Supplier Parties

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4.14 The SIP will need to have the ability to send communications to the DNO and the Registered Supplier using Market Messages (DTC flows) over the Data Transfer Network. This will require the SIP to be set up as a new Role Code, and for the relevant Market Messages to include new Scenario Variants where the SIP will send and receive information between the SIP and the Registered Supplier and/or the DNO/ IDNO. To enable this, ~~will require~~ some system changes will be required and this is being captured within a corresponding ~~subsequent~~ REC Change (**R0021: Allowing REC accredited MEMs to de-energise and re-energise supply points independent of the Supplier**).

4.15 Existing processes that require communication outside of the Market Messages – such as phone or email, will continue to use the existing mechanisms and contacts that the SIP uses in their capacity as a REC MEM.

4.16 Section 2G of DCUSA will stipulate what information should be provided to DNO, IDN0 and Electricity Supplier Parties.

4.17 The SIP will be expected to report any dangerous incidents and damage to the relevant DNO/ IDNO Party as they currently do now as a REC accredited MEM. If this is a Category A situation, then the SIP will ensure that the DNO/ IDNO is notified by telephone in a prompt and appropriate manner having regard to the nature of the incident to which the report relates.

4.18 Where the SIP comes across any matter or incident that is a Category B Situation, then the SIP shall ensure that the DNO/ IDNO is notified of such report or enquiry using the Market Message MM00023 (Data Transfer Network ~~-(~~data flow D0135). As stated above the REC Change R0021, will make changes to the Market Messages ~~DTN~~ to allow for a SIP to be set up as a new Role Code to enable these flows to be sent.

4.19 The DCUSA will also place an obligation on the SIP to notify the Electricity Supplier where the following occurs:

- the flow of electricity through an Exit Point has been interrupted (and remains interrupted);
- there has been interference with any electricity metering equipment that has prevented such metering equipment from correctly registering the quantity of electricity supplied; and/or
- the electricity metering equipment otherwise presents a danger,

4.20 The provision of information Clauses are set out in Section 2G, within the legal text (Attachment 2).

Liability

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4.21 Section 2G will state that the SIP shall indemnify DNO, IDNO and Electricity Supplier Parties against all actions, proceedings, costs, demands, claims, expenses, liability, loss or damage arising directly from physical damage to the property of any person caused by the SIP in exercising the SIP's rights under Section 2G (but excluding liability for any loss of profit, loss of revenue, loss of use, loss of contract or loss of goodwill, and subject to a cap of £1 million per incident or series of related incidents).

4.22 Within DCUSA there is an existing liability clause between DNOs, IDNOs and Suppliers in relation to working on each other's assets. The suggestion within Paragraph 4.21 above follows the same principle.

4.23 The full legal Text for DCP 394 can be found in Attachment 2.

Question 3: Do you agree that the permitted works for a SIP should be limited to the works detailed in Section 4.5 of this consultation? If not, please provide your rationale.

Question 4: Do you have any comments on the proposed provision of information Clauses set out in Section 2G of the legal text?

Question 5: Do you agree that the liability clause within Section 2G should follow the same principle as existing DCUSA agreements between DNO, IDNO and Electricity Supplier Parties? If not, please provide your rationale.

Question 6: Do you have any other comments on the proposed legal text for DCP 394?

Acceding to DCUSA to act as a SIP

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4.24 As stated above, any MEM wishing to accede to DCUSA to act as a SIP to undertake the works identified in Paragraph 4.5, will need to accede to DCUSA to establish the legal relationship with Distributors and Electricity Suppliers. A MEM would only need to accede to the Clauses relevant to DCP 394 and will not need to contribute to any DCUSA related costs and will not need to become DCUSA Panel or Board members.

4.25 When acceding to DCUSA a MEM, wishing to become a SIP would need to provide the following information:

- Company Name
- Registration Number
- Registered Address
- Principle Operating Address
- Confirmation of being a REC accredited MEM
- Contract Manager (a primary contact for DCUSA related matters)
- Contract Manager Telephone Number

- Contract Manager Email Address

Raising Changes and Voting Rights

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4.26 If this Change Proposal (CP) is implemented a SIP Party will be eligible to raise and vote on CPs related to DCUSA Section 2G.

Question 7: If implemented, do you agree that a SIP Party should be able to raise and vote on CPs related to Section 2G? If not, please provide your rationale.

DCP 390 Authority Send Back Letter and Subsequent Decisions

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4.27 **DCP 390 'Provision of Isolations for Safe Working on Customers' Electrical Installations'** was raised by Northern Powergrid with the aim of defining a process detailing how a customer can obtain timely main supply electrical isolations to allow for safe working on their electrical installations. The CP stated that it was the Electricity Suppliers responsibility to provide safe isolations for their customers. The proposed legal text for DCP 390 sought to place an obligation on Electricity Supplier to publish on their website how a customer could obtain a safe isolation, it also sought to place an obligation (SLA) on Electricity Suppliers to provide the safe isolation within 10 working days of the customer request and for them to report on their performance in relation to this SLA.

4.28 DCP 390 was submitted to Ofgem for decision on 21 December 2021. Ofgem subsequently provided an Authority Send Back letter on 2 February 2022. Within their letter they stated that both DCP 390 and DCP 394 cannot be simultaneously implemented. This is because DCP 390 places sole obligation of the provision of isolations on Electricity Supplier parties, whereas DCP 394 intends to allow REC accredited MEM to carry out the service without Supplier party involvement.

4.29 Following Ofgem's response, the proposer of DCP 390 has worked with the proposer of DCP 394 and the Working Group to try to integrate some of the requirements from DCP 390 into DCP 394 with a view to agreeing a way forward that helps customers, offers new opportunities to industry and facilitates the transition to net zero.

4.30 As a result, the DCP 394 Working Group proposes that DCP394 should specify a SIP of last resort that will meet customer requirements for a safe isolation where no SIP party volunteers to satisfy a request. It is agreed that this SIP of last resort should be the Electricity Supplier of the aeffected customer.

4.31 DCP 394 will mandate that an Electricity Supplier should provide clear and transparent procedures by which their customers can obtain temporary De-energisation and subsequent Re-energisation of the customers Connected Installation in order to enable electrical work to take place at the installation. DCP 394 will not place any SLA obligations or reporting requirements on Electricity Suppliers and instead will state that they should offer an appointment for the temporary De-energisation within a reasonable time frame.

4.32 The above does not contradict any other proposed solution within DCP 394, but simply ensures that as a minimum a customer can receive temporary De-energisation from their existing Electricity Supplier.

4.33 The proposed legal text in relation to the above is set out in Clauses 25.32 to 25.36 within Attachment 2 of this consultation.

Question 8: Do you agree that as a minimum the customer should be able to contact their Electricity Supplier to obtain an isolation for safe working on their electrical installation? If not, please provide your rationale.

Other Code Changes

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Retail Energy Code

Meter Operation Code of Practice (MOCOP)

4.34 If DCP 394 is approved, the MOCoP will also need to be amended. This is because at present the MOCoP states that a MEM is only able to break the seals on and work upon Metering Equipment and DNO Equipment if; at the relevant Metering Point, they are the appointed MEM and are instructed by the electricity Supplier appointed to the relevant Metering Point; or for whole current metering only, at the relevant Metering Point, they are not the appointed MEM, but they are required, by a third party electricity Supplier or by the Gas Supplier responsible under the DCUSA for the equipment used for the communications with gas meters at the Site, to carry out certain work at the Metering Point.

Commented [RC7]: Does MOCOP state this?

4.35 The REC Modification R0026 will amend MOCOP to articulate the SIP role and Safe Isolation Works allowed.

4.36 A Clause will also need to be added to the REC to state that any MEM wishing to undertake the works detailed in Section 4.5 above independently will need to accede to DCUSA.

Provision of Information

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4.37 As mentioned above, REC Modification R0026 will make the necessary amendments to ensure that a SIP is set up as a new Role Code, and for the relevant Market Messages to include new Scenario Variants where the SIP will send and receive information between the SIP and the Registered Supplier and/or the DNO/ IDNO.

Smart Energy Code

4.38 Under SEC Section F4.6, the DCC gives consent to energy Suppliers to interfere with SMETS2+ Comm Hubs for the purposes of complying with the SEC. The DCP 394 Working Group discussed whether a change would be required as a result of DCP 394.

4.39 DCP 394 would allow any accredited MEM to carry out Safe Isolations Works (as defined above) at any metering installation when not working on behalf of a Supplier. In doing so, the Smart meter, DCC Comms Hub and Devices on the Smart meter Home Area Network, will be powered off and then on again. However, at no point is the Meter Operator on-site to carry out any work on the Smart Meter, DCC Comms Hub or Devices on the Smart Metering Home Area Network and the DCP 394 will not allow for this.

4.40 It is therefore the DCP 394 Working Groups view that this is no different to a power outage occurring, whereby power supply is interrupted for a period of time and then is reinstated. In most instances the Supply is returned, and all devices continue to operate as before the interruption.

4.41 In incidents where the Smart meter, Comms Hub and/or HAN devices did not return to their pre interrupted operating state, the SIP carrying out work, should inform the Consumer who would then need to contact their registered energy Supplier. The registered energy Supplier would then need to investigate, which may result in them sending their appointed MEM to fix the fault.

Commented [RC8]: REC received some challenges on this, and the feeling was that the SIP should advise the Supplier (if known) as well as informing the consumer.

Question 9: Do you agree with the Working Group view that no change to the Smart Energy Code is required should DCP 394 be approved? If not, please provide rationale.

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 394 will be measured against the DCUSA General Objectives, which are set out in the table below:

DCUSA General Objectives Please tick the relevant boxes.	**Identified impact**
☒ 1 The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks	Positive
☐ 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

☐3 The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences	Neutral
☒ 4 The promotion of efficiency in the implementation and administration of the DCUSA	None
☐ 5 Compliance with the EU Internal Market Regulation and any relevant legallybinding decisions of the European Commission and/or the Agency for the Cooperation of Energy Regulators.	None

5.2 General Objective 1 The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks

5.3 The current situation where appointments to de-energise can only be secured via the registered Supplier means that electricians sometimes bypass the correct process and de-energise the metering point themselves which is a breach of the ESQCRs and can result if safety concerns.

5.4 This change will increase the pool of meter operators that can de-energise ~~at~~ an individual metering point which~~and~~ should reduce the timescales for securing a de-energisation for both electricians and low carbon technology installers.

5.5 By reducing the number of "illegal" de-energisations this change better facilitate General Objective 1.

5.6 General 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

5.7 This change will enable any REC~~MOCOPA~~ accredited MEM (in their capacity of SIP)~~meter operator~~ to de-energise and re-energise any metering point connected to the distribution system. This will alleviate some of the issues low carbon technology installers currently face where they are unable to secure an appointment to de-energise the metering point through the registered Supplier in a reasonable time. These delays result in jobs being aborted and in some cases, customers cancelling jobs which inhibits progress towards net zero.

Commented [RC9]: CB - That's subjective - what is a reasonable time.? 2. Isn't the issue more about the premise owners being unable to secure effective installation of isolators or low and zero carbon technology equipment?

5.8 Those energy suppliers that wish to offer bundled energy and low carbon technology services to customers will benefit from this change and therefore General Objective 2 will be better facilitated.

Commented [RC10]: CB - Not sure this is correct. If the supplier is offering a bundled service, they will use their appointment MEM

Question 10: 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

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

6.1 N/A

Does this Change Proposal Impact Other Codes?

BSC	☐
CUSC	☐
Grid Code	☐
MRA	☐
SEC	☐
REC	☒
None	☐

Consideration of Wider Industry Impacts

6.2 N/A

Confidentiality

6.3 This Change is not confidential.

Question 11 Are you aware of any wider industry developments that may impact upon or be impacted by this CP?

7 Implementation

7.1 It is proposed that this CP should be implemented

Commented [RC11]: For agreement

Question 12 Are you supportive of the proposed implementation date being the first DCUSA release following Authority approval?

8 Legal Text

Legal Text

8.1 The proposed DCP 394 Legal Text can also be found in Attachment 2. Any comments on the proposed legal text can be provided in response to question 6 of this consultation.

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 the CP?
2	Are you supportive of the principles of the CP?
3	
4	
5	
6	
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10	

Commented [RC12]: Add at end

10.2 Responses should be submitted using Attachment 1 to dcusa@electralink.co.uk no later than, **01 July 2022.**

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 394 Consultation Response Form

- Attachment 2: DCP 394 Draft Legal Text
- Attachment 3:
- Attachment ~~4~~3: DCP 394 Change Proposal Form