

DCP 394 'Allow any REC Accredited Meter Operator to De-Energise any Metering Point'

Company	Confidential/ Anonymous	1. Do you understand the intent of the CP?
Electrical Safety First	Non-confidential	<i>Yes – this CP will bridge the gap between the network operators, suppliers and the electrotechnical sector for many years. If implemented it will provide a sensible workable solution that is good for all parties and particularly for consumers / end users who are currently the most affected. Having had guilty knowledge of this technical and policy impasse for many years, it is good to see all parties collaborating to finally develop a workable solution to this longstanding issue.</i>
Cheshire Peaks & Plains Housing Trust	Non-confidential	Yes
Utilita Energy Limited	Non-confidential	Yes
Alt HAN Co Ltd.	Non-confidential	Yes
Electricity North West	Non-confidential	Yes, we understand the intend of the CP.
BUUK Infrastructure Limited	Non-confidential	Yes
Northern Powergrid	Non-confidential	Yes
The National Association of Professional	Non-confidential	Yes, we understand the intent of the change proposal.

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Inspectors and Testers		
Electrical Safety Roundtable (Social Housing sub-group)	Non-confidential	Yes, we understand the intent of the change proposal.
Southern Electric Power Distribution plc (SEPD) & Scottish Hydro Electric Power Distribution plc (SHEPD)	Non-confidential	Yes, I understand the intent of the CP
Utility Warehouse	Non-confidential	Yes
ScottishPower Energy Retail Ltd	Non-confidential	Yes
EDF Energy Customers Ltd	Non-confidential	Yes, I understand the DCP 394.
UK Power Networks	Non-confidential	Yes
IMServ Europe Ltd	Non-confidential	Yes

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E.on Next Ltd & npower Commercial Gas Ltd.	Non-confidential	Yes
SSE Energy Supply Ltd	Non-confidential	Yes
Western Power Distribution	Non-confidential	Yes
British Gas	Non-confidential	Yes we understand the intent of the CP

Company	Confidential/Anonymous	2. Are you supportive of the principles of the CP?
Electrical Safety First	Non-confidential	Yes
Cheshire Peaks & Plains Housing Trust	Non-confidential	Yes
Utilita Energy Limited	Non-confidential	Yes, we are supportive of this Change Proposal, as this will help improve processes for EV installations.

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Alt HAN Co Ltd.	Non-confidential	No comment
Electricity North West	Non-confidential	Yes, we are supportive of the principles of the CP.
BUUK Infrastructure Limited	Non-confidential	Yes
Northern Powergrid	Non-confidential	Yes
The National Association of Professional Inspectors and Testers	Non-confidential	<p>Yes, we are supportive of the principles of the change proposal. The recent survey of our members experience when requesting the removal of the Service Cut-Out Fuse for a domestic property, which features as a supporting document of this consultation, provides further evidence for the positive impact this change proposal would have.</p> <p>Results from 620 registered competent electrical businesses when asked the most common problem with requesting and arranging the safe isolation of an electrical supply, 24% suggested finding the right number to call, 17% getting through to the right department and 42% speaking to someone who understands the problem. Furthermore, 25% of respondents confirmed a supplier has refused a request from them to temporarily isolate an electrical supply.</p> <p>When asked how often in a typical year our members required the services of a supplier to remove the service cut-out fuse to allow the ability to work safely, 34% of respondents required this between 11-30 time a year. Additionally, 33% of respondents estimate it takes two or more 15-minute calls to supplies to arrange the removal and replacement of a service cut-out fuse, while 26% suggested that they get their customers to manage it as it saves them time.</p> <p>Worryingly, 43% of respondents wait longer than two weeks for the supplier to visit the site, with 13% waiting more than four weeks. 60% of respondents are charged by their electricity supplier to remove</p>

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		<p>and replace the service cut-out fuse to enable the safe operation, with 38% paying the supplied over £75 for the service.</p> <p>Therefore, it is evident from our member survey that the current situation is very confusing and causes a lot of frustration within the industry. Multiple respondents were told to 'remove the seals' some via email which completely contradicts the guidance and gives confusing messages to the electrical contractors.</p>
<p>Electrical Safety Roundtable (Social Housing sub-group)</p>	<p>Non-confidential</p>	<p>Yes, we are supportive of the principles set out within the change proposal.</p> <p>We recently undertook a survey of our social housing sub-group participants to understand the impact of the current situation regarding requesting electrical isolation for safe working. A list of our participants, can be found here: Participants - ESR (electricalsafetyroundtable.co.uk).</p> <p>The survey respondents manage a total of 350,400 social housing dwellings with 60% of them organising more than 150 service cut-out fuse removals or replacements per year. Similarly, 94% of respondents expect to see an increase of more than 10% in the demand for the removal and replacement of service cut-out fuses in the next 24 months due to the increased focus on heat pumps and electric vehicle charge points.</p> <p>When asked how easy it is to arrange the removal and replacement of a service cut out fuse, on a scale of 1 to 10, with 1 being extremely hard and 10 being extremely easy, respondents gave an average answer of 3.</p> <p>79% of respondents suggested the main difficulties were to do with arranging a convenient date and 89% of respondents stated there were issues with arranging a date within a reasonable time (this being 10 working days). Other notable issues raised were getting through to the correct department, costs, and the requirement for the bill payer to request the service. It was noted by some respondents that these delays have a knock-on effect causing issues with rent loss due to void properties and delays in allowing new residents to move in. Furthermore, some respondents noted problems with the standards of service for example a lack of standardized procedures between meter operators with some charging for DPI installs and other not.</p>

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		<p>Other respondents flagged worries about their employee's safety, with reports of individuals putting themselves in danger and working outside of scope to meet demand.</p> <p>When asked how the current system could be improved to be more efficient, 47% of respondents suggested through the creation of dedicated phone numbers for each electricity supplier. Additionally, 60% suggested this process could be improved through an electrician's scheme to allow competent electrical contractors, registered with a third-party certified scheme operator to undertake the removal and replacement of service cut-out fuses.</p> <p>Other possible solutions to make the process more efficient noted by respondents included standards of service to be put in place for a maximum time during which an appointment should be offered and REC registered meter operators being allowed to remove and replace service cut-out fuses on equipment owned by any electricity supplier- which demonstrates support for this Change Proposal.</p> <p>Also, it was noted the property manager/owner should be permitted to request the removal or replacement of the SCOF as well as the electricity bill payer.</p> <p>It was agreed that this change proposal will reduce issues with timing and delays and simplify the process for requesting isolation for safe working</p>
<p>Southern Electric Power Distribution plc (SEPD) & Scottish Hydro Electric Power Distribution plc (SHEPD)</p>	<p>Non-confidential</p>	<p>Yes, I support the principles that a REC accredited MEM's can operate in the capacity of a SIP and carry out deenergisation and reenergisation work.</p>

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Utility Warehouse	Non-confidential	Yes
ScottishPower Energy Retail Ltd	Non-confidential	Although we understand the principles of this CP we believe that it may cause more problems than solve.
EDF Energy Customers Ltd	Non-confidential	Yes, I am supportive of DCP 394.
UK Power Networks	Non-confidential	Yes – subject the comments from UK Power Networks below being appropriately addressed.
IMServ Europe Ltd	Non-confidential	Yes
E.on Next Ltd & npower Commercial Gas Ltd.	Non-confidential	Yes in principle it is a better experience for the customer especially where local authorities are doing a refurbishment that requires multiple properties to be worked on at one time.
SSE Energy Supply Ltd	Non-confidential	Yes
Western Power Distribution	Non-confidential	Yes
British Gas	Non-confidential	We fully support the principles of the CP. We believe this change will improve the experience for customers, landlords and tenants wanting to arrange a safe isolation on their premises.

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Company	Confidential/ Anonymous	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.
Electrical Safety First	Non-confidential	Yes
Cheshire Peaks & Plains Housing Trust	Non-confidential	Yes
Utilita Energy Limited	Non-confidential	Yes
Alt HAN Co Ltd.	Non-confidential	No comment
Electricity North West	Non-confidential	<p>This CP is for the provision of a safe isolation service only and we believe the SIP should be limited to the works detailed in Section 4.5 of the consultation document.</p> <p>However, the parties who will become SIPs may see a benefit in providing additional services like the installation of an isolator, an EV charger or heat pumps etc.</p> <p>There have been separate change proposals for other works, such as relocating meters when carrying out a service alteration so any additional work should be included in a separate CP. Therefore, this CP should not include removing/relocating the meter for example.</p>
BUUK Infrastructure Limited	Non-confidential	Yes
Northern Powergrid	Non-confidential	Yes

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The National Association of Professional Inspectors and Testers	Non-confidential	Yes, we agree that the permitted works for a SIP should be limited to the works detailed in Section 4.5 of this consultation.
Electrical Safety Roundtable (Social Housing sub-group)	Non-confidential	Yes, we agree that the permitted works for a SIP should be limited to the works detailed in Section 4.5 of this consultation.
Southern Electric Power Distribution plc (SEPD) & Scottish Hydro Electric Power Distribution plc (SHEPD)	Non-confidential	I agree with the limited scope but continue to have concerns that without a supplier authority or at least notification, any subsequent issues identified with the equipment at a property, and for example, missing seals, would mean the last operative that worked on the equipment is not known, putting into question liabilities.
Utility Warehouse	Non-confidential	Yes
ScottishPower Energy Retail Ltd	Non-confidential	We do not agree with this change proposal, therefore don't agree with the works.
EDF Energy Customers Ltd	Non-confidential	Yes, I agree the permitted works for a SIP should be only limited to that detailed in section 4.5.
UK Power Networks	Non-confidential	Yes the scope is appropriate and facilitates the install of a double pole isolator and the isolation with an appropriate facility to check tightness of cut- out and meter terminals if affected.

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IMServ Europe Ltd	Non-confidential	Yes
E.on Next Ltd & npower Commercial Gas Ltd.	Non-confidential	Yes, we feel It is important that work is restricted to certain criteria so there are clear boundaries that a SIP is not permitted to touch and work on.
SSE Energy Supply Ltd	Non-confidential	Yes
Western Power Distribution	Non-confidential	Yes
British Gas	Non-confidential	We agree that the permitted works for a SIP should be limited to the works detailed in Section 4.5

Company	Confidential/ Anonymous	4. Do you have any comments on the proposed provision of information Clauses set out in Section 2G of the legal text?
Electrical Safety First	Non-confidential	None
Cheshire Peaks & Plains Housing Trust	Non-confidential	No

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Utilita Energy Limited	Non-confidential	No
Alt HAN Co Ltd.	Non-confidential	No
Electricity North West	Non-confidential	No, we believe that these cover the required level of information on the basis that there should be a certain level of knowledge and understanding by a MOP.
BUUK Infrastructure Limited	Non-confidential	No
Northern Powergrid	Non-confidential	No
The National Association of Professional Inspectors and Testers	Non-confidential	No comments.
Electrical Safety Roundtable (Social Housing sub-group)	Non-confidential	No comment.
Southern Electric Power Distribution plc (SEPD) &	Non-confidential	Similar to question 3, there is nothing that stipulates MEMs are required to notify suppliers/DNO's of any works being carried out on their equipment. Subsequent faults/issues identified, if seals are not present, may be very difficult to prove liability

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Scottish Hydro Electric Power Distribution plc (SHEPD)		
Utility Warehouse	Non-confidential	No
ScottishPower Energy Retail Ltd	Non-confidential	There does not appear to be any clear penalties if a SIP causes damage and if a supplier needs to take remedial action. There is also the risk of impact on Settlements, Prepayment issues and SMART communications (including comms with the gas meter). Suppliers need full visibility of any work being carried out on their equipment, there should be a clear audit trail.
EDF Energy Customers Ltd	Non-confidential	No Comments to the proposed provision in Section G of the legal text.
UK Power Networks	Non-confidential	<p>In relation to the Company's distribution system should reference be made to Building Network Operators as it is not clear how SIPS get permission to work on BNO's as they are not party to DCUSA.</p> <p>Draft Clause 52W.4. The company would require prior notice (a specified period) from the SIP in an appropriate format for 2 reasons:</p> <ul style="list-style-type: none"> • to identify the cause of the power outage alert; and • to provide an audit trail to enable tracing of activity should there have been a post incident fault. <p>We suggest that the working group include an obligation on the parties to provide a notification of all isolation activity within this DCP proposal (including what works are to be carried out, at what address, on what date and by whom) and consider a "fit for purpose" solution for communication and recording of the notification data and to provide access to the relevant Parties to this agreement.</p>

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		<p>Draft Clause 52W.6. We agree with this draft clause and believe it is necessary to include this as part of the agreement. However if it is envisaged that the SIPs will engage contractors or agents, then works undertaken by such agents “on behalf of” the SIPs then the contractor or agent will also need to comply with the Permitted Works in draft Clauses 52W1 -52W6.</p> <p>What controls are in place to ensure that contractors or agents working “on behalf of” the SIPS have the relevant competencies and ongoing experience as Meter Operators.</p> <p>Draft Clause 52X.5. The Clause 52X.5 for CAT A’s should updated to include both telephone or online notification facilities.</p> <p>Draft Clause 52X.6. The Clause 52X.6 for CAT B’s should updated to include both Data Flow D0135 and online notification facilities.</p> <p>Draft Clause 52X.7. The Clause 52X.7 for CAT C’s should updated to include notification within 5 days in line with CAT B notification in draft Clause 52X.6.</p> <p>Draft Clauses 52X5/6. Defect Notifications: With regard to notifications on other Supplier’s mpans (data flow D0135) the current practice is to provide feedback through Data Flow D0126/0368 to the actual supplier and meter operator (not the SIP), if we continue with the current practice suppliers and meter operators will receive unsolicited data flows.</p> <p>The SIP activity will generate additional work alongside the Smart Meter Intervention Programme activity and consideration should be given to a dispensation against the DNO SLA’s.</p>
IMServ Europe Ltd	Non-confidential	No comment – insufficient time for our Legal team to review
E.on Next Ltd & npower	Non-confidential	No comments

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Commercial Gas Ltd.		
SSE Energy Supply Ltd	Non-confidential	No
Western Power Distribution	Non-confidential	No
British Gas	Non-confidential	We do not have any comments on the proposed provision of information clauses set out in section 2G

Company	Confidential/ Anonymous	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.
Electrical Safety First	Non-confidential	N/A
Cheshire Peaks & Plains Housing Trust	Non-confidential	Yes
Utilita Energy Limited	Non-confidential	Yes
Alt HAN Co Ltd.	Non-confidential	No comment

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Electricity North West	Non-confidential	Yes, we agree the liability clause should follow the same principle as existing DCUSA Agreements as they have been created and maintained through experience over the years.
BUUK Infrastructure Limited	Non-confidential	Yes, although we would like to understand the rationale behind the non-indemnity by the MEM SIP for IDNO, DNO, Supplier costs, loss of revenue, loss of profits, and good will.
Northern Powergrid	Non-confidential	Yes. In terms of liability levels, we feel these are out of the scope of this change and should be raised as a separate issue.
The National Association of Professional Inspectors and Testers	Non-confidential	Yes, we agree that the liability clause within Section 2G should follow the same principle as existing DCUSA agreements between DNO, IDNO and Electrical Supplier Parties.
Electrical Safety Roundtable (Social Housing sub-group)	Non-confidential	Yes, we agree that the liability clause within Section 2G should follow the same principle as existing DCUSA agreements between DNO, IDNO and Electrical Supplier Parties.
Southern Electric Power Distribution plc (SEPD) & Scottish Hydro Electric Power Distribution plc (SHEPD)	Non-confidential	Yes, I agree

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Utility Warehouse	Non-confidential	Yes
ScottishPower Energy Retail Ltd	Non-confidential	We believe a supplier should be notified every time a SIP touches their equipment, not just if they are unable to de-energise and re-energise the same day. There is also a risk that for SMART meters, the comms for the gas may drop out.
EDF Energy Customers Ltd	Non-confidential	Yes, I agree the same principles as existing DCUSA between DNO, IDNO & Electricity suppliers.
UK Power Networks	Non-confidential	<p>There is a concern that a SIP may not have the financial covenant to stand behind its physical damage liabilities – for example where a block of flats is damaged in a single incident. This in turn may lead to a review of the liability cap.</p> <p>In any event there should be a requirement for the SIP to have significant public liability insurance of £ 5 million</p> <p>With regard to the issue of a block of flats, for the avoidance of doubt this agreement does not give the SIPS permission to work on assets that are not in the ownership or the responsibility of the DNO.</p>
IMServ Europe Ltd	Non-confidential	No comment – insufficient time for our Legal team to review
E.on Next Ltd & npower Commercial Gas Ltd.	Non-confidential	Yes, It needs to be really clear who is liable for what and have a clear process in place for each party to follow, however we have a few observations

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SSE Energy Supply Ltd	Non-confidential	Yes
Western Power Distribution	Non-confidential	Wording of 52W.9 seem fine, just that the monetary figure seems quite low for possible damages that could be caused to properties. Feel that a more up to date higher figure is needed for the liability clause.
British Gas	Non-confidential	We agree that the liability clause within Section 2G should follow the same principle as existing DCUSA arrangements.

Company	Confidential/ Anonymous	6. Do you have any other comments on the proposed legal text for DCP 394?
Electrical Safety First	Non-confidential	No – fully supportive
Cheshire Peaks & Plains Housing Trust	Non-confidential	No
Utilita Energy Limited	Non-confidential	No further comments.
Alt HAN Co Ltd.	Non-confidential	No
Electricity North West	Non-confidential	4.2.4 What does 'qualified' add? Are there some MEMS which are not qualified?

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		<p>12.3 We thought SIP parties didn't get their own vote because they are not a panel member (6.1)</p> <p>12.9.3 Not sure about voting rights. Should a party that does not contribute to costs be entitled to vote?</p> <p>52W.4 'to the extent reasonably required in order to do so' seems very broad. There is no definition of what a safe isolation is and perhaps there needs to be e.g. to remove the DNO fuse and adequately shroud any exposed conductors. Then to replace the fuse when the customer requires the supply to be re-energised.</p> <p>52W.5.1 Not sure why any additional work at the cost of the SIP is required in DCUSA. This change is for a very simple activity – provide an isolation and then re-energise. Any additional work the SIP may be carrying out is not relevant to DCUSA.</p> <p>52W.7 This gives carte balance for a SIP to 'interfere' with our equipment and we will not agree to that.</p> <p>52W.9 Is this a relaxation of existing liability under DCUSA/MOCOPA? If so we will need to run it past our legal team.</p> <p>52 X Why are we trying to re-write existing obligations which already exist on Suppliers? We need the Cat A, B and C hazard identification and reporting process to be followed consistently; not risk errors in the re-wording; and any future changes making in one place only. We should make reference to the relevant Codes/sections.</p>
BUUK Infrastructure Limited	Non-confidential	Yes. Whilst the workgroup agreed that there must be a SIP of last resort and that that last resort SIP should be the supplier, this has not been included within the legal text. We believe that it should be explicitly stated within the legal text.
Northern Powergrid	Non-confidential	No

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The National Association of Professional Inspectors and Testers	Non-confidential	No comments.
Electrical Safety Roundtable (Social Housing sub-group)	Non-confidential	No comment
Southern Electric Power Distribution plc (SEPD) & Scottish Hydro Electric Power Distribution plc (SHEPD)	Non-confidential	No further comments
Utility Warehouse	Non-confidential	No
ScottishPower Energy Retail Ltd	Non-confidential	No
EDF Energy Customers Ltd	Non-confidential	I have no further comments to add for DCP 394.
UK Power Networks	Non-confidential	No

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IMServ Europe Ltd	Non-confidential	No comment – insufficient time for our Legal team to review
E.on Next Ltd & npower Commercial Gas Ltd.	Non-confidential	<ul style="list-style-type: none"> - There is no mention of a process that will be followed if the SIP connect the meter again and there is a problem with the meter (in smart it fails to connect correctly) - If it follows BAU processes where an emergency job is booked and the job was for a block of flats, this would put considerable resource on the MEM to find resource to complete site visit and establish connection with the meter so customers have supply - What will the process be for vulnerable customers, will this be the responsibility of the local authority to resolve and make sure that there are reasonable provisions in place for the customer before the works are carried out? <p>It is our understanding that these additional observations are to be informed through the associated REC change R0021.</p>
SSE Energy Supply Ltd	Non-confidential	No
Western Power Distribution	Non-confidential	No
British Gas	Non-confidential	We do not have any further comments

Company	Confidential/ Anonymous	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.
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Electrical Safety First	Non-confidential	Yes
Cheshire Peaks & Plains Housing Trust	Non-confidential	Yes
Utilita Energy Limited	Non-confidential	Yes
Alt HAN Co Ltd.	Non-confidential	No comment
Electricity North West	Non-confidential	We believe that a SIP Party should be able to raise and vote on CPs related to Section 2G.
BUUK Infrastructure Limited	Non-confidential	Yes
Northern Powergrid	Non-confidential	Yes
The National Association of Professional Inspectors and Testers	Non-confidential	Yes, we agree that a SIP Party should be able to raise and votes on change proposals related to Section 2g.
Electrical Safety Roundtable	Non-confidential	Yes, we agree that a SIP Party should be able to raise and vote on change proposals related to Section 2g.

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(Social Housing sub-group)		
Southern Electric Power Distribution plc (SEPD) & Scottish Hydro Electric Power Distribution plc (SHEPD)	Non-confidential	Yes, I agree a SIP party should be able to raise and vote on CPs, only related to Section 2G.
Utility Warehouse	Non-confidential	Yes
ScottishPower Energy Retail Ltd	Non-confidential	No, we do not agree that a SIP should have voting rights. We think they have a right to raise a change and be involved in that process, but not to vote as they are not equipment owners.
EDF Energy Customers Ltd	Non-confidential	Yes I agree that a SIP should have CP voting rights related only to section 2G.
UK Power Networks	Non-confidential	Yes, but not outside 2G
IMServ Europe Ltd	Non-confidential	Yes
E.on Next Ltd & npower Commercial Gas Ltd.	Non-confidential	Yes – we believe that changes is related to the SIP process and will impact the process then SIPs should have rights to change and vote on DCUSA elements of relevant to the SIP role.

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SSE Energy Supply Ltd	Non-confidential	Yes
Western Power Distribution	Non-confidential	Yes
British Gas	Non-confidential	We agree that a SIP Party should be able to raise and vote on CPs related to Section 2G

Company	Confidential/ Anonymous	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.
Electrical Safety First	Non-confidential	Yes. The alternative is that consumers/customers will make other arrangements with their electrician or the electrical enterprise will take the matter in their own hand, which has been the case for many years and far too long. This CP will provide the clarity and certainty needed.
Cheshire Peaks & Plains Housing Trust	Non-confidential	Yes
Utilita Energy Limited	Non-confidential	This is the current process, as a customer can and will be able to contact their Electricity Supplier for an isolation. What this Change Proposal will achieve is to expand the scope of who can conduct this process (not just for Electricity Suppliers).
Alt HAN Co Ltd.	Non-confidential	No comment

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Electricity North West	Non-confidential	<p>We believe that the supplier is responsible for providing a safe isolation service. This proposal provides for some customers, who may benefit from approaching one organisation (the SIP) to provide all their isolation services.</p> <p>They will benefit from improved communications and potentially economies of scale; outcomes that will also benefit some customers.</p> <p>Some customers will need:</p> <ul style="list-style-type: none"> • advice and guidance on how to obtain a safety isolation; or • to check that their safety isolation service provider is accredited; or • provision of a safety isolation service should they not be able to engage a SIP. <p>The Electricity Supplier should provide this.</p>
BUUK Infrastructure Limited	Non-confidential	Yes
Northern Powergrid	Non-confidential	Yes. Please see comment in Q13.
The National Association of Professional Inspectors and Testers	Non-confidential	Yes, we 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 and it is important that the electricity supplier has ultimate responsibility. It is also vital that the supplier is required to clearly publish their procedure, timescales and process for doing so
Electrical Safety Roundtable (Social Housing sub-group)	Non-confidential	Yes, we 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 and it is important that the electricity supplier has ultimate responsibility.

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		In addition to this, the electricity supplier should publish their procedure, process and timescales on their website alongside a dedicated phone number to call to request an isolation to allow for safe working.
Southern Electric Power Distribution plc (SEPD) & Scottish Hydro Electric Power Distribution plc (SHEPD)	Non-confidential	Yes, I agree.
Utility Warehouse	Non-confidential	Yes
ScottishPower Energy Retail Ltd	Non-confidential	Yes.
EDF Energy Customers Ltd	Non-confidential	Yes I agree with this.
UK Power Networks	Non-confidential	Yes, the customer must have a reasonable alternative agency to contact to provide isolation facilities which would logically default to the Electricity Supplier.
IMServ Europe Ltd	Non-confidential	Yes
E.on Next Ltd & npower Commercial Gas Ltd.	Non-confidential	On the basis that suppliers are currently the only party who can arrange a change of energisation status we agree that customers should be able to contact their supplier as part to assist with the installation of an isolation switch, as that offers a backstop that supplier must make arrangements with the customer to isolate supplies in addition to the ability to procure the services of a SIP.

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SSE Energy Supply Ltd	Non-confidential	Yes
Western Power Distribution	Non-confidential	Yes, and this needs to be clearly advertised/identifiable on websites
British Gas	Non-confidential	We agree that a customer should be able to contact their Electricity Supplier obtain a safe isolation for safe working

Company	Confidential/ Anonymous	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.
Electrical Safety First	Non-confidential	Yes
Cheshire Peaks & Plains Housing Trust	Non-confidential	Yes
Utilita Energy Limited	Non-confidential	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.
Alt HAN Co Ltd.	Non-confidential	No comment

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Electricity North West	Non-confidential	We agree in principle that no change to the Smart Energy Code is required should DCP 394 be approved, under 4.41.
BUUK Infrastructure Limited	Non-confidential	Yes
Northern Powergrid	Non-confidential	Yes
The National Association of Professional Inspectors and Testers	Non-confidential	Yes, we agree with the Working Group view that no change to the Smart Energy Code is required should DCP 394 be approved.
Electrical Safety Roundtable (Social Housing sub-group)	Non-confidential	Yes, we agree with the Working Group view that no change to the Smart Energy Code is required should DCP 394 be approved.
Southern Electric Power Distribution plc (SEPD) & Scottish Hydro Electric Power Distribution plc (SHEPD)	Non-confidential	Yes, I agree
Utility Warehouse	Non-confidential	Yes

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ScottishPower Energy Retail Ltd	Non-confidential	We have not had time to analyse this fully. However the risk of gas comms issues needs to be covered somewhere
EDF Energy Customers Ltd	Non-confidential	Yes I agree no change to the Smart Energy Code is required if DCP 394 is approved.
UK Power Networks	Non-confidential	We think this may be an issue for suppliers only.
IMServ Europe Ltd	Non-confidential	Yes
E.on Next Ltd & npower Commercial Gas Ltd.	Non-confidential	Yes
SSE Energy Supply Ltd	Non-confidential	Yes
Western Power Distribution	Non-confidential	Yes
British Gas	Non-confidential	We agree that no change is required to the Smart Energy Code

Company	Confidential/ Anonymous	10. Do you consider that the proposal better facilitates the DCUSA General Objectives?
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		<p>If so, please detail which of the General Objectives you believe are better facilitated and provide supporting reasons.</p> <p>If not, please provide supporting reasons.</p>
Electrical Safety First	Non-confidential	<p>Development, maintenance and operation by DNO/iDNO parties of efficient, co-ordinated and economical distribution networks – this CP demonstrates collaboration between networks and suppliers, as well as the electrotechnical sector for the mutual benefit of operational efficiency as well as improved safety. It will provide a clear pathway and transparency for electricians and their customers (consumers), as well as for DNOs and Suppliers. It also adds some futureproofing to the likely increase of otherwise unauthorised isolations due to increase in net zero technologies.</p> <p>Applies also to the promotion of efficiency in the implementation and administration of DCUSA</p>
Cheshire Peaks & Plains Housing Trust	Non-confidential	Yes. Surely this would stop illegal removal of service fuses and give the customer an easier way and better timeframe of requesting an isolator to be fitted.
Utilita Energy Limited	Non-confidential	Yes, DCP 394 best facilitates effective competition in the supply of electricity, which aligns with DCUSA second General Objective.
Alt HAN Co Ltd.	Non-confidential	No comment
Electricity North West	Non-confidential	We agree that the change proposal better facilitates the development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks as well as 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.

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		<p>We consider that only some larger customers will benefit from the competition that this CP will provide, as not all customers will be able to benefit from this change. It is important that electricity suppliers provide equitable alternatives where competition is not likely to work.</p> <p>We are also not sure that we will see any benefit as a DNO as we receive and are likely to still receive calls from one-off type customers who are confused by this and are looking to the DNO rather than the supplier for a safe isolation service so having to go and find a SIP may confuse them even further.</p>
BUUK Infrastructure Limited	Non-confidential	Yes
Northern Powergrid	Non-confidential	Yes – 1 and 2 for the reasons outlined in the proposal
The National Association of Professional Inspectors and Testers	Non-confidential	Yes, we agree that the proposal better facilitates number 1 and 2 as outlined in the consultation document.
Electrical Safety Roundtable (Social Housing sub-group)	Non-confidential	Yes, we agree that the proposal better facilitates number 1 and 2 as outlined in the consultation document.
Southern Electric Power Distribution plc (SEPD) & Scottish Hydro Electric Power	Non-confidential	<p>General objective 1 is mostly positive by increasing the pool of MEMs, however concerns remain that without knowledge of when SIP's are working on equipment, this may lead to liability issues if faults/issues are found.</p> <p>General objective 2 is positive in that it will enable wider choice and prompt isolations to be carried out.</p>

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Distribution plc (SHEPD)		
Utility Warehouse	Non-confidential	<p>General Objective 1 - we agree that this objective is better facilitated by this modification because an increased pool of MOPs will increase efficiency and coordination for de-energising and re-energising meter points.</p> <p>General Objective 2 - we agree that this objective is better facilitated by this modification. It will remove barriers in the installation process of low carbon technology and hence remove barriers towards net zero.</p>
ScottishPower Energy Retail Ltd	Non-confidential	No, we believe this CP will create risk although we understand the rationale behind the CP.
EDF Energy Customers Ltd	Non-confidential	<p>Yes, see below the extract of a letter sent from BEIS on this matter.</p> <p>Letter from BEIS</p> <p><i>On 21 December 2021, the DCUSA Panel submitted a Change Report (CR) for DCUSA modification proposal DCP390. We have decided that we cannot form an opinion on whether to <u>accept or reject</u> DCP340 (340 = typo from OFGEM) based on the CR as submitted to us. This is due to conflicts with another DCUSA change proposal, DCP394 'Allow any REC accredited meter operator to de-energise any metering point', which is currently in the working group phase.</i></p> <p><i>We are therefore sending back the DCP390 CR to industry for further work.</i></p> <p><i>Further detail on the conflicts between DCP390 and DCP394 are outlined below.</i></p> <p><i>The DCP390 modification proposal seeks to amend the DCUSA to clarify that Supplier parties are solely responsible for the provision of an isolation service (de-energisation and re-energisation works). It also seeks to implement a 10 working day timeframe for the works as well as obligate Supplier parties to publish a transparent process for isolations.</i></p>

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		<p><i>The DCP394 change proposal seeks to widen the scope of DCUSA to allow any accredited meter operator to carry out de-energisation and re-energisation works at any metering installation(s) when not working on behalf of a Supplier party.</i></p> <p><i>Whilst we understand that the two proposals propose to deal with slightly different issues, both cannot be simultaneously implemented. This is because DCP390 places sole obligation of the provision of isolations on Supplier parties, whereas DCP394 intends to allow accredited meter operators to carry out the service without Supplier party involvement. As such the benefits of a single responsible party, 10 Working Day timeframe, and clear and transparent process imposed on Supplier parties under DCP390 would be undermined should DCP394 be accepted.</i></p>
UK Power Networks	Non-confidential	We agree with the working group's assessment of impact the proposals and that it does better facilitate a number of the DCUSA General Objectives but General Objective 4 "The Promotion of Efficiency and implementation and Administration of DCUSA" that if a "fit for purpose" solution for communication and recording of the notification data is provided that this would be a "Positive" rather than "Neutral".
IMServ Europe Ltd	Non-confidential	Yes
E.on Next Ltd & npower Commercial Gas Ltd.	Non-confidential	Yes
SSE Energy Supply Ltd	Non-confidential	(No entry)

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Western Power Distribution	Non-confidential	General Objectives 1 and 2 would be better facilitated by the proposed changes to the DCUSA. Opening the scope of what can be offered to customers to enable electrical connections to be completed safer and more compliant has got to be a good solution.
British Gas	Non-confidential	<p>General Objective 1: The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks</p> <p>We consider that the proposal better facilitates DCUSA General Objective 1. This change will ensure Suppliers provide clear and transparent guidance to their customers on how to obtain a safe isolation and this should reduce the number of “illegal” unsafe isolations being carried out on the network.</p> <p>We also believe that the modification will improve the customer journey and will make it simpler for customers and the organisations that they are contracting with to obtain safe isolations. This will have a consequential effect on the operation of the network by enabling installation of new low carbon technologies such as solar, EV and battery technology facilitating a more dynamic and flexible network.</p> <p>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</p> <p>This change will allow any REC Accredited MEM to provide a safe isolation to any metering point connected to the distribution system. This will therefore help in the drive to net zero and facilitate competition in the sale of electricity by:</p> <ul style="list-style-type: none"> • Allowing low carbon technology providers to contract directly with a single MEM to provide a better customer journey • Assist landlords where currently it is necessary to co-ordinate across multiple energy suppliers where properties require isolation prior to refurbishment

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Company	Confidential/ Anonymous	11. Are you aware of any wider industry developments that may impact upon or be impacted by this CP?
Electrical Safety First	Non-confidential	This could impact on the current scheme for isolation currently operated by SSEPD – my belief is that this CP has the means to provide broader consistency across all networks and nations.
Cheshire Peaks & Plains Housing Trust	Non-confidential	No
Utilita Energy Limited	Non-confidential	No
Alt HAN Co Ltd.	Non-confidential	<p>Alt HAN Co has tracked DCP394 and attended working group discussions as these have helped inform thinking on DCP400. DCP400 (raised by Shell in support of the Alt HAN Forums work on Crowded Meter Rooms) seeks to enable the use of a Shared MOP/MEM by the Crowded Meter Room Coordinator. DCP400 and the related REC change R0043, has some crossover with this change proposal. Legal text drafted for both change proposals is similar, as both require amendments to DCUSA for permission to carry out specified works on a metering point. Through the work of DCP394/400 we have concluded that DCP400 is not <i>dependent</i> on this change proposal, and vice versa. Both are distinctly different in the mechanisms through which work is carried out and the transparency to DCUSA Parties.</p> <p>It is hoped that where works are carried out under the DCP400 and DCP394 provisions in the same premises that there can be further coordination to maximise efficiency and minimise disruption to customers.</p>
Electricity North West	Non-confidential	None.

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BUUK Infrastructure Limited	Non-confidential	No
Northern Powergrid	Non-confidential	No
The National Association of Professional Inspectors and Testers	Non-confidential	No, we are not aware of any wider industry developments that may impact this change proposal.
Electrical Safety Roundtable (Social Housing sub-group)	Non-confidential	No, we are not aware of any wider industry developments that may impact this change proposal.
Southern Electric Power Distribution plc (SEPD) & Scottish Hydro Electric Power Distribution plc (SHEPD)	Non-confidential	No
Utility Warehouse	Non-confidential	Yes
ScottishPower Energy Retail Ltd	Non-confidential	No.

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EDF Energy Customers Ltd	Non-confidential	No, I am not aware of any further developments that may impact or be impacted by this CP.
UK Power Networks	Non-confidential	<ol style="list-style-type: none"> 1. EV request and fuse upgrades – but other LCT’s as well. These activities are becoming more prevalent as a cause for isolation activity. 2. Smart Meter Power Outage Alerts provided to the DNO’s. This solution needs to be “fit for purpose” and consider the appropriate notification required to separate legitimate power outage notifications from notification for SIP Isolation visits. 3. Competition Law - where a SIP is also an LCT provider the SIP/LCT provider could gain a competitive advantage over other LCT providers, as they can provide one team to undertake the whole end to end process (eg of installing the EV Charger or Heat Pump), including the isolation activity, therefore incurring only one set of costs whereas LCT providers who are not SIPs will incur the costs of instructing the SIP as well as the cost of their own LCT team. 4. Without the appropriate communication to the supplier, we believe the isolation activity through an independent SIP is contrary to our expectations of the supplier hub principle. The principle and definition should be explored to consider what additional mitigation would be needed.
IMServ Europe Ltd	Non-confidential	It would benefit the proposed ALT-HAN crowded meter room project, which is proposed to commence in 2023
E.on Next Ltd & npower Commercial Gas Ltd.	Non-confidential	No

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SSE Energy Supply Ltd	Non-confidential	No
Western Power Distribution	Non-confidential	CP400 Crowded Meter Rooms works
British Gas	Non-confidential	We are not aware of any wider industry developments that may impact upon this CP

Company	Confidential/ Anonymous	12. Do you agree with the Working Group's proposed indicative implementation date? Please provide your rationale.
Electrical Safety First	Non-confidential	Yes – the proposed date will provide a sensible transition date to allow all impacted parties to be implementation ready and allow for wide promotion of the change, including alerting electricians and consumers.
Cheshire Peaks & Plains Housing Trust	Non-confidential	Yes, just to get any implementation decision in 2022 is a bonus.
Utilita Energy Limited	Non-confidential	Yes
Alt HAN Co Ltd.	Non-confidential	No comment
Electricity North West	Non-confidential	Yes, we agree with the proposed indicative implementation date.

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BUUK Infrastructure Limited	Non-confidential	Yes
Northern Powergrid	Non-confidential	Yes
The National Association of Professional Inspectors and Testers	Non-confidential	Yes, we agree with the proposed implementation date, however if this can be implemented earlier this would be better.
Electrical Safety Roundtable (Social Housing sub-group)	Non-confidential	Yes, we agree with the proposed implementation date, however if this can be implemented earlier this would be better.
Electrical Safety Roundtable (Social Housing sub-group)	Non-confidential	We are very supportive of the proposals outlined within this change proposal and believe they will have a positive impact on resident safety.
Southern Electric Power Distribution plc (SEPD) & Scottish Hydro Electric Power Distribution plc (SHEPD)	Non-confidential	Yes, I agree.

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Utility Warehouse	Non-confidential	We agree that this modification should be implemented in the next earliest release
ScottishPower Energy Retail Ltd	Non-confidential	We do not agree with the proposal, however if it is approved, we would expect a minimum of 12months to implement as system changes and training updates are expected.
EDF Energy Customers Ltd	Non-confidential	Yes, I agree with the proposed implementation date.
UK Power Networks	Non-confidential	No. The implementation date has passed and a new dates need to be scheduled including appropriate lead times for communication and implementation of proposal.
IMServ Europe Ltd	Non-confidential	Yes
E.on Next Ltd & npower Commercial Gas Ltd.	Non-confidential	Yes 2023 will give enough time for parties to get ready for this change and implement any system updates to accommodate the new data flows that will be sent by the SIP by ensuring this modification is implemented concurrently with REC (R0021).
SSE Energy Supply Ltd	Non-confidential	Yes dependent on release of the REC R0021 change report. If timeline of the R0021 change is delayed, then voting should also be delayed for this change. The 19/08 release date of the change report for voting should coincide with the REC R0021 change report (26/08) to which suppliers can vote based on the suitability of the REC solution.
Western Power Distribution	Non-confidential	Ideally getting this change in earlier would be better for all parties, possibly February release date if approved in time.

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British Gas	Non-confidential	<p>We do not agree with the proposed indicative implementation date of June 2023. This change was raised by the proposer in September 2021 and we feel it is unreasonable to delay the implementation of this change on the grounds of the timescales required for relevant system changes.</p> <p>The system changes proposed only relate to a small proportion of the isolations required by the market and it is unreasonable to delay the implementation of this proposal when the vast majority of isolations can be carried out without any system changes being required.</p> <p>The working group should look at what would be required to allow an earlier implementation date (preferably November 2022). This may include a combination of using alternative communication methods that do not require system changes and aborting jobs where required.</p>
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Company	Confidential/ Anonymous	13. Do you have any other comments in relation to DCP 394?
Electrical Safety First	Non-confidential	No, other than this CP is long-awaited and will make a real difference in closing the safety gap that has existed for many years. It cannot afford to fail, as the problem this CP is trying to fix will get much worse if it is not implemented, putting reputations and lives at risk.
Cheshire Peaks & Plains Housing Trust	Non-confidential	No
Utilita Energy Limited	Non-confidential	There is no mention of any interim provisions of information until DTC changes are introduced, this should be highlighted more clearly.
Alt HAN Co Ltd.	Non-confidential	None

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Electricity North West	Non-confidential	There is a risk that some customers will need to spend an unrealistic amount of time trying to find a SIP to provide their service or that they cannot find a SIP to provide the service. There should be an obligation on each Electricity Supplier to appoint one or more SIPs to be their Safe Isolations Provider of last resort. This would then provide a choice to customers. They could contract directly with a SIP or choose to use their Electricity Supplier's appointed SIP, knowing a service must be provided. This would make it easy for customers to compare the offering directly from a SIP and provide an easy route for those customers who did not want to potentially shop around and approach multiple SIPs to find one which might provide the service to them.
BUUK Infrastructure Limited	Non-confidential	No
Northern Powergrid	Non-confidential	<p>As the proposal will not mandate a MEM to accede to DCUSA, controls will need to be put in place to ensure that non-acceding MEMs do not carry out SIP activity.</p> <p>If the "SIP of last resort" is utilised i.e. the MEM appointed by the Supplier for that Customer, it is possible that that MEM may not accede to DCUSA as they may choose not to carry out SIP work for other parties (so not needing to accede to DCUSA). Therefore, it should be noted that the SIP of last resort is not actually that but the MEM appointed by the Supplier who is instructed to carry out a de-energisation/re-energisation on behalf of the Supplier – as they are currently.</p>
The National Association of Professional Inspectors and Testers	Non-confidential	The National Association of Professional Inspectors and Testers members survey clearly demonstrates the issues and concerns with the current system. The proposal outlined in this Change Proposal will simplify the process and lead to enhanced standards of safety. This will be imperative to support an increase in electric vehicle chargepoint installations, and the installation of low carbon technologies such as Heat Pumps.
Southern Electric Power Distribution plc (SEPD) &	Non-confidential	We are supportive of this CP, but recognise there are risks working without supplier approval/notification. Standards will be harder to manage due to a lack of knowledge of works being carried out. Seals will be the only way to know and if seals are not applied the supplier/ DNO may be liable for issues at the customer's position.

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Scottish Hydro Electric Power Distribution plc (SHEPD)		
Utility Warehouse	Non-confidential	(No entry)
ScottishPower Energy Retail Ltd	Non-confidential	No.
EDF Energy Customers Ltd	Non-confidential	No further comments.
UK Power Networks	Non-confidential	<p>Our concerns are as follows:</p> <ol style="list-style-type: none"> 1. Visibility of the power outage activity. 2. Traceability and Record Keeping of SIPS working on our networks. 3. Activities on BNO Networks. 4. SIPS limitations on liability and ensuring the SIPS have a sufficiently high public liability insurance to meet liabilities. 5. The possible competition law challenge from independent LCT companies 6. The "Supplier Hub Principle" challenge <p>Further, with regard clause 4.25 of the Consultation Document we would expect the SIP to be obliged to record their Public Liability Insurance Provider and Policy details.</p>
IMServ Europe Ltd	Non-confidential	None

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E.on Next Ltd & npower Commercial Gas Ltd.	Non-confidential	No comments
SSE Energy Supply Ltd	Non-confidential	
SSE Energy Supply Ltd	Non-confidential	<p>We have concerns over Safety risks of allowing a MEM who is not in contract with the Supplier to carry out work on site.</p> <p>We have concerns on communicating energisation status changes where the SIP cannot re-energise. If DCP394 is authorised for Implementation, but the REC change cannot address these concerns, then we believe the decision to Implement DCP394 should be post R0021.</p>
Western Power Distribution	Non-confidential	No
British Gas	Non-confidential	We have no other comments