

DCUSA Change Report		At what stage is this document in the process?
<h1>DCP 394</h1> <h2>Allow any REC accredited meter operator to de-energise any metering point</h2> <p>02 September 2021</p> <p>Standard Change</p>	01 – Change Proposal	
	02 – Consultation	
	03 – Change Report	
	04 – Change Declaration	
<p>Purpose of Change Proposal:</p> <p>DCP 394 seeks to widen the scope of DCUSA to allow any REC accredited meter operator to carry out de-energisation and re-energisation works.</p>		
	<p>This document is issued in accordance with Clause 11.20 of the DCUSA, and details DCP 394 'Allow any REC accredited meter operator to de-energise any metering point'. Parties are invited to consider the proposed amendment (Attachment 1) and submit their votes using the Voting form (Attachment 2) to dcusa@electralink.co.uk by 02 November 2022.</p> <p>The voting process for the proposed variation and the timetable of the progression of the Change Proposal (CP) through the DCUSA Change Control Process is set out in this document.</p> <p>If you have any questions about this paper or the DCUSA Change Process, please contact the DCUSA by email to dcusa@electralink.co.uk or telephone 020 7432 3011.</p>	
	<p>Parties Impacted: DNOs, IDNOs and Suppliers</p>	
	<p>Impacted Clauses:</p> <p>Impacted Clauses: Amendments to Section 1A - Clause 1 'Definitions' and Clause 4 'Accession of Additional Parties', Section 1B – Clause 6 'Panel Members' and Clause 8 'Costs of the DCUSA', Section 1C – Clause 10 'Change Proposals' and Clause 12 'Voting' as well as the Introduction of new Section 2H (Clauses 52Y-52AA) and amendment to Schedule 9 'Accession Agreement'</p>	

Contents

1 Executive Summary	3
2 Governance	4
3 Why Change?	4
4 Solution	Error! Bookmark not defined.
5 Relevant Objectives	20
6 Impacts & Other Considerations	21
7 Implementation	22
8 Legal Text	22
9 Code Specific Matters	22
10 Recommendations	22
11 Attachments	23



Any questions?

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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	20 June 2022
Change Report Approved by Panel	19 October 2022
Change Report issued for Voting	19 October 2022
Party Voting Closes	02 November 2022
Change Declaration Issued to Parties	03 November 2022
Change Declaration Issued to Authority	03 November 2022
Authority Decision	TBC
Implementation	29 June 2023

1 Executive Summary

What?

- 1.1 To widen the scope of DCUSA to allow any Retail Energy Code (REC) accredited Meter Equipment Manager (MEM), in the capacity of a Safe Isolations Provider (SIP), to carry out De-energisation and Re-energisation works and if reasonably necessary adjust the terminals or terminate/replace the customer tails 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.

Why?

- 1.2 Where there is Proximate Metering Equipment in situ the 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. Where the MEM is working on behalf of a Gas or Electricity Supplier, in these circumstances, they may 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 Low and Zero Carbon Technologies (LZCT) the arrangements for allowing the activities mentioned in paragraph 1.1 need to change.
- 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 3.

How?

- 1.5 The intention will be to amend DCUSA to provide the necessary legal permissions to allow any REC accredited MEM, in the capacity of a SIP, to carry out De-energisation and Re-energisation works and if reasonably necessary adjust the terminals of the meter and re-terminate/replace the

customer tails, if necessary, at any metering installation when not working on behalf of a Gas or Electricity Supplier. For example, the SIP may be working on behalf of a (LZCT) 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 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.

Requested Next Steps

- 2.2 The Panel considered that the Working Group has carried out the level of analysis required to enable Parties to understand the impact of the proposed amendment and to vote on DCP 394.
- 2.3 The DCUSA Panel recommends that this CP:
 - be issued to Parties for voting

3 Why Change?

Background of DCP 394

- 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 multiple electricity Suppliers.
- 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 unauthorised persons break specified seals on Distribution and Supplier owned equipment to complete their work. Whilst this is a breach of ESQCR there has been little 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 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 increasing year-on-year then it can be reasonably assumed that the associated unauthorised breaking of seals may also increase.

- 3.4 This proposal maintains the integrity of ensuring that only REC accredited MEMs, complying with REC obligations can undertake this work.
- 3.5 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 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 accredited 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 association could contract with a REC accredited MEM of their choice based on a commercial agreement.

4 Initial Working Group Analysis

DCP 394 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, in the capacity of a SIP, to carry out De-energisation and Re-energisation works and if reasonably necessary adjust the terminals of the meter or re-terminate/replace the customer tails at any metering installation when not working on behalf of a 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.
- 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 SIP. 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.
- 4.5 The remainder of this Section 4 provides the initial Working Group analysis that was included in the DCP 394 industry consultation, Section 5 provides details of the consultation and Working Group responses, and Section 6 provides areas identified for further analysis and details of the final solution.

Scope of Works

- 4.6 The Working Group discussed the scope of work that a MEM should be able to undertake when acting as a SIP. The Working Group believed 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) 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
 - (d) Re-energise that Entry/Exit Point.
- 4.7 The key aspect of this CP is to assist with the challenges of Net Zero and facilitate the expected growth in installation of LZCTs. It is believed that by widening the scope of DCUSA to allow any SIP to carry out the above works, when not working on behalf of a Supplier, (i.e. the SIP 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)

- 4.8 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 SIP.
- 4.9 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
- 4.10 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 SIP, the Working Group determined that a new industry role would need to be established and defined for this activity.
- 4.11 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 SIP. Acceding to DCUSA as a SIP Party would set up the necessary legal relationship between DNO, IDNO and Supplier Parties in relation to the SIP working on their assets.
- 4.12 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.

Original Proposal - New Section 2G of DCUSA (Now to be Section 2H, additional details later in this Change Report)

4.13 It was proposed that there will be a new Section 2G added to DCUSA and that it would 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.

4.14 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;
 - (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
 - (d) 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 (i.e., you always need to seek permission of the customer separately) 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 REC 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).
- 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 to the Distributer and Supplier (detailed further below)
- A liability clause (detailed further below)

Provision of Information to DNO, IDNO and Electricity Supplier Parties

- 4.15 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, some system changes will be required and this is being captured within a corresponding REC Change (R0021: Allowing REC accredited MEMs to de-energise and re-energise supply points independent of the Supplier).
- 4.16 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.
- 4.17 Section 2G of DCUSA will stipulate what information should be provided to DNO, IDNO and Electricity Supplier Parties.
- 4.18 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.
- 4.19 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 to allow for a SIP to be set up as a new Role Code to enable these flows to be sent.
- 4.20 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,
- 4.21 The provision of information Clauses are set out in Section 2G, within the legal text.

Liability

- 4.22 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).

4.23 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.

Acceding to DCUSA to act as a SIP

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

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.

DCP 390 Authority Send Back Letter and Subsequent Decisions

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 Suppliers 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 MEMs (wishing to become a SIP) 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 DCP 394 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 affected 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 1 of this consultation.

Other Code Changes

Retail Energy Code

Meter Operation Code of Practice (MOCOP)

- 4.34 If DCP 394 is approved, the REC MOCOP will also need to be amended to incorporate the new role of the SIP and the activities it can carry out.
- 4.35 The REC Modification R0021 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

- 4.37 As mentioned above, REC Modification R0021 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 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 SIP on-site to carry out any work on the Smart Meter (other than the specified work described in 4.5), DCC Comms Hub or Devices on the Smart Metering Home Area Network as the DCP 394 solution 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 or during a meter exchange, 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 make all reasonable attempts to inform the Supplier and where not possible 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.

5 Summary of Consultation and Responses

DCP 394 Consultation

- 5.1 The DCP 394 consultation was issued on 20 June 2022 and there were 20 responses received.
- 5.2 A summary of the responses received, and the Working Group's conclusions are set out below. The full set of responses and the Working Group's comments are provided in Attachment 4.

Question 1 - Do you understand the intent of the CP?

- 5.3 All responders confirmed that they understood the intent of DCP 394.

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

- 5.4 All responders confirmed that they support the principles of the CP, bar one who raised that they felt the change may cause problems.

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

- 5.5 All responders bar one agreed with the current scope of activities for a SIP. The Working Group noted that a company who accedes to DCUSA as a SIP may undertake other commercial activities

but this would not be under their SIP role. A few respondents raised concerns that Distributors would not be informed of every SIP job, only the ones where issues have been identified. They noted to reasons for these concerns:

- 1) They will get outage alerts and if they did not know this is a SIP activity, they may send out someone to investigate; and
- 2) it would provide details to help establish who last worked on that asset should any safety events happen after work is completed.

5.6 The Working Group considered all the above and more details are provided in Section 6.

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

5.7 As highlighted under question 3, one responder raised concern over how MEMs will notify Suppliers/DNOs of works being carried out. Concerns were raised over subsequent faults/ issues and liability. One respondent noted that there is also the risk of impact on Settlements, Prepayment issues and SMART communications.

5.8 It was also noted that 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 in relation to Category B reporting.

5.9 Another response questioned how SIPs will get permission from Building Network Operators (BNOs) as they are not DCUSA Parties.

5.10 The Working Group considered all the above and more details are provided in Section 6.

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.

5.11 A majority of respondents agreed that the liability clause within Section 2G should follow the same principle as existing DCUSA agreements between DNO, IDNO and Electricity Supplier Parties.

5.12 A few respondents stated that the liability cap should be higher, although another noted that any changes to the current liability principles in DCUSA should be reviewed separately and out of scope of DCP 394. One respondent noted that SIPS should provide evidence that they have a sufficiently high public liability insurance to meet liabilities.

5.13 The Working Group considered the above and more details are provided in Section 6.

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

5.14 The majority of responses did not include any further comments on the legal text.

5.15 One respondent asked how vulnerable customer are to be treated and this has been addressed further in Section 6 of this Change Report.

- 5.16 There were a few comments made, which the Working Group have either provided clarity in the consultation responses (Attachment 4) or where also captured in other questions and have been considered further as detailed in Section 6 of this Change Report.

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.

- 5.17 All responses except one agreed that a SIP Party should be able to raise and vote on CPs related to Section 2G.
- 5.18 The Working Groups final decision is captured in Section 6.

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.

- 5.19 All responders agreed that the customer should be able to contact their Electricity Supplier to obtain an isolation for safe working on their electrical installation.
- 5.20 One response highlighted that some customers may need further advice and guidance and suggested the Electricity Supplier should provide this. The Working Group considered what additional advice and guidance could be provided if this CP is approved further and details are provided within Section 6 of this consultation.
- 5.21 One respondent stated that whilst the Working Group 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. The Working Group considered this comment and clarification is included in Section 6.

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.

- 5.22 All responses bar one agreed with the Working Group view that no change to the Smart Energy Code is required. One responder noted that they had not had time to analyse this fully, however highlighted that the risk of gas comms issues.
- 5.23 The Working Group addressed this further as detailed in Section 6 of this Change Report.

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.

- 5.24 A majority of the respondents agreed that, if implemented, DCP 394 would better facilitate the DCUSA General Objectives. The Working Group analysis can be found in Section 7.

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

- 5.25 The majority of responders were not aware of any wider industry developments that may impact upon or be impacted by this CP. One response highlighted that it could impact on the current scheme for isolation currently operated by SSEPD. The Working Group noted that this scheme is on hold and will be reviewed following a decision on this CP.
- 5.26 One respondent raised concerns in relation to competition law as below:
- “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”.
- 5.27 Another comment received was as below:
- “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”.
- 5.28 The Working Group response to the above can be found in Section 6.

Question 12 – Do you agree with the Working Group’s proposed indicative implementation date? Please provide your rationale.

- 5.29 The majority of responders agreed with the Working Group’s proposed indicative implementation date. One response suggested that the implementation date should be brought forward to November 2022 and noted that as system changes relate to a small proportion of isolations required, it is unreasonable to delay implementation. The response suggested that the Working Group consider what would be required to allow an earlier implementation date, possibly using alternative communication methods.
- 5.30 The Working Group response to the above can be found in Section 6.

Question 13 – Do you have any other comments in relation to DCP 394?

- 5.31 One respondent stated that 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. The Working Group will provide some considerations of appropriate advice and guidance that can be provided in Section 6 of this Change Report.
- 5.32 One respondent noted that the phrase “SIP of last resort” is not actually true as it would be the customers Supplier utilising their appointed MEM as currently happens today. The Working Group agreed. What was really meant when the phrase “SIP of last resort” was used, was that a customer should always be able to obtain a safe isolation from their Supplier and, if implemented, this CP will mandate that all Suppliers must provide details on their website of how a customer can obtain this.

6 Working Group Conclusions and Final Solution

Working Group Conclusions

6.1 After consideration of the consultation responses, the Working Group identified the following areas for further consideration:

- SIP Scope of Works
- SIP communication to DNO and Suppliers
- Contractual Guidance (Vulnerable customer and SIP permission from BNOs)
- Further review of liability clauses within DCUSA
- SIP voting rights
- Obligation of Suppliers to publish processes for their customers to obtain a safe isolation
- Supplier Hub Principles
- Competition Law
- Implementation date (See Section 9)
- Appropriate communications/publications to be included on the DCUSA, REC and DNO websites, regarding SIPs.

SIP Scope of Works

6.2 As stated in Section 5, a majority of the consultation respondents stated they agreed with the Working Groups proposed scope of works for a SIP. It was therefore agreed that Safe Isolation Works will remain unchanged from the consultation as defined 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
- (c) if required, terminate/ replace the customer tails on the Electricity Supplier's meter; such tails must have been provided and tested by the SIP Party or the customer's electrical engineer; and
- (d) Re-energise that Entry/Exit Point.

SIP communication to DNO and Suppliers

Suppliers

6.3 As stated in Section 5, there were concerns raised in relation to communications from the SIP to the Supplier, particularly in relation to risk of impact on Settlements, Prepayment issues and SMART communications. The Working Group believe that these issues have been resolved within

the subsequent REC Change ([R0021: Allowing REC accredited MEMs to de-energise and re-energise supply points independent of the Supplier](#)).

6.4 R0021 states the following in their Change Report:

Where a Smart Meter is already installed that has smart communications already enabled, the SIP should check that communications have been restored on completion of the work.

On the Smart Meter communications hub there are five connectivity indicators (SW, WAN, MESH, HAN, GAS). The SIP should check which of these are in use prior to de-energising the meter and check that they are all returned to the same state when re-energising. Any differences identified will be notified to the Supplier on completion of the works if the Communications cannot be re-established. (A photograph or video may prove useful to confirm the pre and post status).

If communication was not re-established, the SIP should inform the Registered Supplier of the same (by telephone) and inform the tenant so that the Registered Supplier may take action to resolve this.

6.5 Furthermore, R0021 states the following:

On completion of the work – *The SIP will send a Market Message (new) to the Supplier to advise that they have completed Safe Isolation Works. The SIP will include the date of de-energisation (if on a different date to the re-energisation) and re-energisation date, and any observations that they may wish to make the Supplier aware of, and the Supplier should action any information provided accordingly (for example, instances of vulnerability, or other on-site considerations).*

6.6 The Working Group concluded that DCP 394 and R0021 combined, address the issues raised from Suppliers within the consultation. Further information on the development of any new Market Messages can be found within the R0021 Change Report.

Distributors

6.7 The Working Group considered the comments received in the consultation in relation to Distributors needing to be informed of all intended SIP works prior to the work being undertaken. As stated in Section 5 this will avoid prompting unnecessary site visits to deal with off-supply issues related to SIP activities and will help in establishing who last worked on that asset should any safety events happen after work is completed.

6.8 It was also noted that within Ofgem's 'RIIO-ED1 regulatory instructions and guidance: Annex F – Interruptions' document, there is a new obligation on Distributors as below:

Section 2.11

Single premises power outage alerts originating from a smart meter are not reasonably expected to indicate no supply. Where an outage alert is received, the DNO should contact the customer as soon as reasonably practicable thereafter to check whether the customer is without power, but only between 8am and 9pm. However, this should not restrict the DNO

from contacting a customer outside of those hours if the DNO considers it in the customer's interest to do so. The single premises power outage alert originating from a smart meter will be deemed to have been received at the earliest of either 8am or when there is contact with the customer.

- 6.9 After consideration of the above, the Working Group concluded that before attending site, the SIP will need to provide the DNO with at least 1 Working Day's notice of the date they intend to carry out the programme of work.
- 6.10 To facilitate this, the Working Group considered that the best approach would be to create a new Market Message or to create an App, which SIPs could easily download and provide Distributors with the relevant details. Unfortunately, this request came too late for it to be included in the REC Change (R0021) and therefore the Working Group concluded that this work should commence outside of DCP 394 and R0021. It has been confirmed that ENA will work with Distributors to ensure this work is commenced and the most appropriate solution is put in place. MEMs will be consulted during this process.
- 6.11 As stated above, the SIP will send a Market Message (new) to the Supplier to advise that they have completed Safe Isolation Works. Following discussions within the DCP 394 Working Group, it was identified that this flow should also go to the relevant Distributor. Unfortunately, this request has come too late to be included in the R0021 requirements as this change is already with Ofgem awaiting decision. It was noted that if R0021 is approved by the Authority, a change will be raised to include the Distributor in the new flow. It is anticipated that this will be a self-governance change and ideally will be incorporated into the initial creation of the new flow.
- 6.12 In addition to the above, a 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. The DCP 394 Legal Text sets out the requirements for SIPs to report Category A and B Market Messages to Distributors and the necessary system changes required to facilitate this are captured within R0021.
- 6.13 Existing processes that require communication outside of the Market Messages – such as phone or email, will use the existing mechanisms and contacts that the SIP uses in their capacity as a REC MEM.
- 6.14 Ideally the above developments will be in place prior to the DCP 394 implementation date (29 June 2023), however the Working Groups view is that the lack of these developments should not stop the implementation of DCP 394 on 29 June 2023 should it receive Ofgem approval.

Contractual Guidance (Vulnerable customer and SIP permission from BNOs)

Vulnerable Customers

- 6.15 The Working Group considered the comments received within the consultation responses in relation to vulnerable customers. The Working Group believe that the obligation of identifying any

vulnerable customers should sit with the party commissioning the work and that the SIP should ensure they have sufficient evidence from the party that all tenants have been informed and provided consent for the works to be undertaken and that any vulnerable customers have been identified. Within the R0021 Change Report the following contractual guidance is included:

When the SIP contracts with Homeowners, the SIP should ensure that the contract between them requires the Homeowners to:

- *have given advance notice to any tenants of the impending works, and the homeowners being required to retain evidence of the tenant's consent to the carrying out of the work.*
- *have identified any customers in a vulnerable situation, where the disconnection of the electricity may put the tenant at risk, and that the homeowners have taken appropriate steps to mitigate this and retain appropriate evidence. The information will be collected by the Premise Owner and the necessary consent gained to share the data with the SIP and the tenant's Registered Supplier (where relevant); and*
- *to include a provision that the SIP will only be able to re-energise a Metering Point that has been de-energised by the SIP. Where a Metering Point is found to be de-energised when the SIP attends the site, they must abort the work and may not change the energisation status*

BNOs

6.16 DCP 394 will provide the necessary permissions to allow SIPs to work on Distributor assets to the extent it is necessary to do so in exercising the SIP's rights (i.e. in undertaking the Safe Isolation Works). It does not provide permissions from BNOs. Therefore, where it is identified that the organisation that owns or operates the electricity distribution network within a multiple occupancy building, between the intake position and customers installations is not the Distributor, the SIP would need to seek additional approval from the BNO to undertake Safe Isolation Work.

Further review of liability clauses within DCUSA

6.17 As mentioned in Section 5, a majority of respondents agreed that the liability clause within Section 2G (now Section 2H) should follow the same principle as existing DCUSA agreements between DNO, IDNO and Electricity Supplier Parties, however a couple of respondents noted that the levels of liability may be too low, with one stating that this sits out of scope of this change.

6.18 The Working Group acknowledge the comments raised in relation to current liability levels, but agreed that any changes to these sits out of scope of DCP 394. Given that the caps were set a long time ago, it may be sensible to consider increasing the caps for all parties, through a separate CP.

6.19 One consultation respondent noted that SIPs should provide evidence that they have a sufficiently high public liability insurance to meet liabilities. After review, the Working Group also agreed that this should sit out of scope of this CP and considered within a CP reviewing liability more generally.

SIP voting rights

- 6.20 As stated above, all respondents bar one agreed that SIP Party should be eligible to raise and vote on CPs related to DCUSA Section 2G (now Section 2H - the new Section introduced by this CP).
- 6.21 After further consideration, the Working Group decided to keep to their position pre consultation and the DCP 394 legal text will outline that SIP Parties can raise and vote on CPs relating to Section 2H.

Obligation of Suppliers to publish processes for their customers to obtain a safe isolation

- 6.22 As stated above, the phrase “SIP of last resort” used within the DCP 394 consultation caused confusion. What was really meant when the phrase “SIP of last resort” was used, was that a customer should always be able to obtain a safe isolation from their Supplier and, if implemented, this CP will mandate that all Suppliers must provide details on their website of how a customer can obtain this.
- 6.23 This obligation is detailed in Clauses 25.32 to Clause 25.36 within the proposed DCP 394 legal text (Attachment 1).

Supplier Hub Principles

- 6.24 Early on in this CP, the Working Group considered a Supplier led approach. This would have allowed Supplier Parties to offer a safe isolation service on any metering point. Each Supplier offering the service could have had contractual relationships with one or more SIP organisations. At all times the Supplier Party offering the safe isolations service would have been responsible for the activity of the SIP acting on their behalf, at a given meter point, and would have been subject to the relevant liabilities already contained in DCUSA that relate to assets owned by incumbent DCUSA parties, at a given meter point.
- 6.25 After review of the above solution, the Working Group concluded that the original proposed solution of allowing SIPs to work independently would open the market more and provide more options for customers seeking a safe isolation service.

Competition Law

- 6.26 One respondent raised a concern around competition law as below.
- “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”.
- 6.27 The Working Group do not believe this is a concern as in theory anyone can apply to become a REC accredited MEM. There may be organisations in a better position from day 1 but there are no restrictions for anyone to become a SIP, if they follow the relevant rules.
- 6.28 The DCUSA legal advisors agreed with the Working Group view stating that the barrier to entry to becoming a Meter Operator / SIP is not high.

Appropriate communications/publications to be included on the DCUSA, REC and DNO websites, regarding SIPs.

6.29 The Working Group considered appropriate communications and agreed that these should be developed and be ready for publication upon implementation.

Post Legal Text Review

6.30 It should be noted that throughout the development of this CP, the legal text had been produced on the basis that DCP 394 would be implemented ahead of DCP 400. As both are intending on creating a new sub-section of Section 2 (i.e., Section to 2G and 2H) the Working Group had referenced the creation of Section 2G for this CP. However, whilst drafting this Change Report, it has become clear that it is much more likely that DCP 400 will be implemented ahead of DCP 394 and as such, all references to Section 2G should be treated as references to Section 2H and the corresponding Clause numbers adjusted to Clauses 52Y to 52AA rather than 52V to 52X.

7 Relevant Objectives

Assessment Against the DCUSA Objectives

7.1 For a DCUSA Change Proposal to be approved it must be demonstrated that it better facilitates the DCUSA Objectives. There are five General Objectives and six Charging Objectives. The full list of objectives is documented in the CP form provided as Attachment 5.

7.2 The Working Group considers that the following DCUSA Objectives are better facilitated by DCP 394.

DCUSA General Objectives	Identified impact
<input checked="" type="checkbox"/> 1 The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks	Positive
<input checked="" type="checkbox"/> 2 The facilitation of effective competition in the generation and supply of electricity and (so far as is consistent therewith) the promotion of such competition in the sale, distribution and purchase of electricity	Positive
<input type="checkbox"/> 3 The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences	Neutral
<input type="checkbox"/> 4 The promotion of efficiency in the implementation and administration of the DCUSA	None

<input type="checkbox"/> 5 Compliance with the EU Internal Market Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Cooperation of Energy Regulators.	None
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General Objective 1: The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks

- 7.3 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 in safety concerns. Further evidence of this is articulated in a NAPIT survey which can be found in Attachment 3.
- 7.4 This change will increase the pool of MEMs that can de-energise an individual metering point which should reduce the timescales for securing a de-energisation for both electricians and LZCT installers.
- 7.5 By reducing the number of “illegal” de-energisations this change better facilitates General Objective 1.

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

- 7.6 This change will enable any REC accredited MEM (in their capacity of SIP) to de-energise and re-energise any metering point connected to the distribution system. This will alleviate some of the issues LZCT installers currently face where they are unable to secure an appointment to de-energise the metering point through the registered Supplier. This can result in jobs being aborted and in some cases, customers cancelling jobs which inhibits progress towards net zero.
- 7.7 Companies that wish to offer bundled energy and LZCT services to customers will also benefit from this change and therefore General Objective 2 will be better facilitated.

8 Impacts & Other Considerations

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

8.1 N/a

Consideration of Wider Industry Impacts

8.2 N/a

Confidentiality

8.3 This Change is not confidential.

Does this Change Proposal Impact Other Codes?

- BSC
- CUSC
- Grid Code

- SEC
- REC
- None

9 Implementation

9.1 The proposed implementation date for DCP 394 is 29 June 2023.

10 Legal Text

- 10.1 The legal text for DCP 394 has been reviewed by the DCUSA legal advisors and is provided as Attachment 1. As stated above the number has changed and this CP will introduce a new Section 2H, not as originally planned a Section 2G.
- 10.2 The Working Group has considered the legal text and is satisfied that it meets the intent of the solution.

11 Code Specific Matters

Modelling Specification Documents

11.1 N/a

Reference Documents

11.2 N/a

12 Recommendations

Panel's Recommendation

12.1 The Panel approved this Change Report on 19 October 2022. The Panel considered that the Working Group has carried out the level of analysis required to enable Parties to understand the impact of the proposed amendment and to vote on DCP 394.

12.2 The Panel have recommended that this report is issued for Voting and DCUSA Parties should consider whether they wish to submit views regarding this Change Proposal.

13 Attachments

- Attachment 1 – DCP 394 Legal Text
- Attachment 2 – Voting Form
- Attachment 3 – NAPIT Survey Results
- Attachment 4 – DCP 394 Collated Consultation Responses
- Attachment 5 – DCP 394 Change Proposal Form