

## Part A: Generic

DCUSA Change Proposal (DCP)		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><i>Insert date raised 2<sup>nd</sup> September 2021</i></p> <p><i>Proposer Name: Kevin Woollard</i></p> <p><i>Company Name: British Gas</i></p> <p><i>Company Category: Supplier</i></p>		<p><b>01 – Change Proposal</b></p> <p>02 – Consultation</p> <p>03 – Change Report</p> <p>04 – Change Declaration</p>
<p><b>Purpose of Change Proposal:</b></p> <p>To widen the scope of DCUSA to allow any REC accredited meter operator to carry out de-energisation and re-energisation works.</p>		
	<p><b>Governance:</b></p> <p>The Proposer recommends that this Change Proposal should be:</p> <ul style="list-style-type: none"> <li>• Part 1 matter</li> <li>• Treated as a Standard Change</li> <li>• Proceed to Working Group</li> </ul> <p>The Panel will consider the proposer's recommendation and determine the appropriate route.</p>	
	<p><b>Impacted Parties:</b> Suppliers and DNO/IDNOs</p>	
	<p><b>Impacted Clauses:</b> Create new Clauses.</p>	

Contents		?	Any questions?
1	Summary	1	Contact: <b>Melissa Kendall</b>
2	Governance	2	 melissa.kendall@electralink.co.uk
3	Why Change?	4	 0207 432 3024
4	Solution and Legal Text	4	Proposer: <b>British Gas</b>
5	Code Specific Matters	5	 Kevin.woollard@britishgas.co.uk
6	Relevant Objectives	5	 07979 563580
7	Impacts & Other Considerations	6	Other: <b>Insert name</b>
8	Implementation	7	 email address.
9	Recommendations	7	 telephone
<b>Indicative Timeline</b>			Other: <b>Insert name</b>
<b>The Secretariat recommends the following timetable:</b>			 email address.
Initial Assessment Report	15 September 2021		 telephone
Consultation Issued to Industry Participants	October 2021		Other: <b>Insert name</b>
Change Report Approved by Panel	December 2021		 email address.
Change Report issued for Voting	17 December 2021		 telephone
Party Voting Closes	13 January 2022		Other: <b>Insert name</b>
Change Declaration Issued to Parties	17 January 2022		 email address.
Change Declaration Issued to Authority	17 January 2022		 telephone
Authority Decision	21 February 2022		

## 1 Summary

### What

1.1. To widen the scope of DCUSA to allow any MOCOPA accredited meter operator to carry out de-energisation and re-energisation works at metering points at which they are not appointed meter operator.

## Why

1.2. The current DCUSA arrangements only allow non-appointed MOCOPA accredited meter operators to access the DNO main fuse and carry out de-energisation and re-energisation work in certain limited circumstances. These are where the meter operator is working on behalf of a Gas or Electricity Supplier to 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 carbon technologies the arrangements for allowing de-energisation and re-energisation activity need to change.

## How

1.4. The intention will be to amend DCUSA to provide the necessary legal permissions to allow any accredited meter operator to carry out de-energisation and re-energisation work at any metering installation when NOT working on behalf of a Gas or Electricity Supplier. For example the meter operator 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. In order to put in place the necessary legal permissions it is proposed to make meter operators become party to the DCUSA to establish a direct legal relationship between meter operators, distributors and energy suppliers. This will allow them to access distribution owned equipment and provide the required indemnities to the distributor and energy supplier.

## 2 Governance

### Justification for Part 1 and Part 2 Matter

2.1. This change proposal should be treated as a Part 1 Matter as it is likely to have a significant impact on the interests of electricity consumers and it is directly related to the safety or security of consumers.

2.2. This Change Proposal should:

- Be treated as a Part 1
- Be treated as a Standard
- Proceed to Working Group

### 3 Why Change?

- 3.1. It has become apparent over the last few years that the 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 Operator is already appointed to that property. This has caused many issues where, for example, a local authority wishes to refurbish many dwellings but first needs the consent of the electricity supplier. There are currently over 100 licensed domestic 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 hundreds of occasions where a non-MOCOPA party breaks specified seals on Distribution and Supplier owned equipment to complete their work. Whilst this is a breach of ESQCR there has been no enforcement as the industry has not been able to provide a simple solution that can be adopted by all stakeholders.
- 3.3. The installation of Electric Vehicle chargers and other customer generation equipment has seen the number of unauthorised breaking of specified seals increase, with the uptake of EVs increasing year-on-year then it can be reasonably assumed that the associated unauthorised breaking of seals will also increase.
- 3.4. Within the industry there is a programme to enable Multiple Dwelling Units (MDUs) to engage with the smart metering installation programme. This will involve installing additional equipment in various MDU locations, it is feasible that in some of these locations it would be advantageous to install an isolator switch.
- 3.5. It should be noted that only MOCOPA accredited parties have the authority to break Distribution seals and remove the main fuse. This proposed change maintains that requirement.
- 3.6. This issue has been recognised at the DCUSA Safe Isolations Working Group and previously agreed as an issue at the BEIS Smart Metering Operations Group (SMOG) The removal of specified seals and fuses by non-authorised parties is both a health & safety issue and a contravention of ESQCR. The proposed solution maintains the requirement for a party who has acceded to MOCOPA to undertake the activity but broadens who can instruct that party to undertake the work. As an example, a local authority or housing associate could contract with a MOCOPA party of their choice based on a commercial agreement. This could be either a Distributor party or an Operator party.
- 3.7. This proposal maintains the integrity of ensuring that only REC parties, following the Meter Operator Code of Practice (MOCOP) can undertake this work.

### 4 Solution and Legal Text

- 4.1. It is intended to amend the DCUSA to add new sections to Section 2 to put in place
  1. legal relationships between the registered Electricity Supplier of a metering point and the meter operator who wishes to carry out metering work on that metering point
  2. legal relationships between the DNO/IDNO and the meter operator who wishes to work on that metering point

## 5 Code Specific Matters

### Reference Documents

5.1. This proposal builds on the principles approved under DCP 127 and DCP 304 where changes were approved to allow non-appointed meter operators to carry out de-energisation works on meter points.

## 6 Relevant Objectives

DCUSA Charging Objectives	Identified impact
<input type="checkbox"/> 1 that compliance by each DNO Party with the Charging Methodologies facilitates the discharge by the DNO Party of the obligations imposed on it under the Act and by its Distribution Licence	None
<input type="checkbox"/> 2 that compliance by each DNO Party with the Charging Methodologies facilitates competition in the generation and supply of electricity and will not restrict, distort, or prevent competition in the transmission or distribution of electricity or in participation in the operation of an Interconnector (as defined in the Distribution Licences)	None
<input type="checkbox"/> 3 that compliance by each DNO Party with the Charging Methodologies results in charges which, so far as is reasonably practicable after taking account of implementation costs, reflect the costs incurred, or reasonably expected to be incurred, by the DNO Party in its Distribution Business	None
<input type="checkbox"/> 4 that, so far as is consistent with Clauses 3.2.1 to 3.2.3, the Charging Methodologies, so far as is reasonably practicable, properly take account of developments in each DNO Party's Distribution Business	None
<input type="checkbox"/> 5 that compliance by each DNO Party with the Charging Methodologies facilitates compliance with the Regulation on Cross-Border Exchange in Electricity and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.	None
<b>DCUSA General Objectives</b>	<b>Identified impact</b>
<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 Regulation on Cross-Border Exchange in Electricity and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.	None
<p>6.1. 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>6.2. The current situation where appointments to de-energise can only be secured via the registered Supplier means that electricians sometimes bypass the correct process and de-energise the metering point themselves which is a breach of the ESQCRs and can result if safety concerns.</p> <p>6.3. This change will increase the pool of meter operators that can de-energise at an individual metering point and should reduce the timescales for securing a de-energisation for both electricians and low carbon technology installers.</p> <p>6.4. By reducing the number of “illegal” de-energisations this change better facilitate General Objective 1.</p> <p>6.5. 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>6.6. This change will enable any MOCOPA accredited meter operator to de-energise and re-energise any metering point connected to the distribution system. This will alleviate some of the issues low carbon technology installers currently face where they are unable to secure an appointment to de-energise through the registered Supplier in a reasonable time. These delays result in jobs being aborted and in some cases customers cancelling jobs which inhibits progress towards net zero.</p> <p>6.7. Those energy suppliers that wish to offer bundled energy and low carbon technology services to customers will benefit from this change and therefore General Objective 2 will be better facilitated.</p>	

## 7 Impacts & Other Considerations

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

7.1. N/A

## Does this Change Proposal Impact Other Codes?

- BSC
- CUSC
- Grid Code
- MRA
- SEC
- REC
- None

## Consideration of Wider Industry Impacts

7.2. N.A

## Confidentiality

7.3. No

## 8 Implementation

### Proposed Implementation Date

8.1. June 2022 release.

## 9 Recommendations