

DCP 394 'Provision of Isolations for Safe Working on Customers' Electrical Installations COLLATED CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS

Company	Confidential/ Anonymous	1. Do you understand the intent of the CP?	Working Group Comments
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>	Noted.
Cheshire Peaks & Plains Housing Trust	Non-confidential	Yes	Noted.
Utilita Energy Limited	Non-confidential	Yes	Noted.
Alt HAN Co Ltd.	Non-confidential	Yes	Noted.
Electricity North West	Non-confidential	Yes, we understand the intend of the CP.	Noted.
BUUK Infrastructure Limited	Non-confidential	Yes	Noted.
Northern Powergrid	Non-confidential	Yes	Noted.

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

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UK Power Networks	Non-confidential	Yes	Noted.
IMServ Europe Ltd	Non-confidential	Yes	Noted.
E.on Next Ltd & npower Commercial Gas Ltd.	Non-confidential	Yes	Noted.
SSE Energy Supply Ltd	Non-confidential	Yes	Noted.
Western Power Distribution	Non-confidential	Yes	Noted.
British Gas	Non-confidential	Yes we understand the intent of the CP	Noted.
SP Distribution plc and SP Manweb plc	Non-confidential	Yes	Noted.
<p>Working Group Conclusions:</p> <p>All responders confirmed that they understood the intent of the CP.</p>			

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Company	Confidential/ Anonymous	2. Are you supportive of the principles of the CP?	Working Group Comments
Electrical Safety First	Non-confidential	Yes	Noted.
Cheshire Peaks & Plains Housing Trust	Non-confidential	Yes	Noted.
Utilita Energy Limited	Non-confidential	Yes, we are supportive of this Change Proposal, as this will help improve processes for EV installations.	Noted.
Alt HAN Co Ltd.	Non-confidential	No comment	Noted.
Electricity North West	Non-confidential	Yes, we are supportive of the principles of the CP.	Noted.
BUUK Infrastructure Limited	Non-confidential	Yes	Noted.
Northern Powergrid	Non-confidential	Yes	Noted.
The National Association of Professional	Non-confidential	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	Noted.

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Inspectors and Testers		<p>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 times a year. Additionally, 33% of respondents estimate it takes two or more 15-minute calls to suppliers 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 and replace the service cut-out fuse to enable the safe operation, with 38% paying the supplier 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</p>	
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		completely contradicts the guidance and gives confusing messages to the electrical contractors.	
Electrical Safety Roundtable (Social Housing sub-group)	Non-confidential	<p>Yes, we are supportive of the principles set out within the change proposal. 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</p>	Noted.

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		<p>procedures between meter operators with some charging for DPI installs and other not.</p> <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 owner 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>	
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Southern Electric Power Distribution plc (SEPD) & Scottish Hydro Electric Power Distribution plc (SHEPD)	Non-confidential	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.	Noted.
Utility Warehouse	Non-confidential	Yes	Noted.
ScottishPower Energy Retail Ltd	Non-confidential	Although we understand the principles of this CP we believe that it may cause more problems than solve.	Noted.
EDF Energy Customers Ltd	Non-confidential	Yes, I am supportive of DCP 394.	Noted.
UK Power Networks	Non-confidential	Yes – subject the comments from UK Power Networks below being appropriately addressed.	Noted.
IMServ Europe Ltd	Non-confidential	Yes	Noted.
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.	Noted.

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SSE Energy Supply Ltd	Non-confidential	Yes	Noted.
Western Power Distribution	Non-confidential	Yes	Noted.
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.	Noted.
SP Distribution plc and SP Manweb plc	Non-confidential	Yes	Noted.
<p>Working Group Conclusions:</p> <p>All responders confirmed that they support the principles of the CP, bar one who raised that they felt the change may cause problems.</p>			

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.	Working Group Comments
Electrical Safety First	Non-confidential	Yes	Noted.

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Cheshire Peaks & Plains Housing Trust	Non-confidential	Yes	Noted.
Utilita Energy Limited	Non-confidential	Yes	Noted.
Alt HAN Co Ltd.	Non-confidential	No comment	Noted.
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>	Noted. A company who accedes to DCUSA as a SIP may undertake other commercial activities, but this would not be under their SIP role.
BUUK Infrastructure Limited	Non-confidential	Yes	Noted.
Northern Powergrid	Non-confidential	Yes	Noted.

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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.	Noted.
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.	Noted.
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.	<p>The matter of notifications to the DNO is considered in detail under section 6 of the Change Report.</p> <p>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 work. A new Market Message or app will be developed outside of DCP 394 to enable this.</p> <p>On completion of work, R0021 states that the SIP will send a Market Message to the Supplier to advise the work is completed. This flow should also go to the DNO. if R0021 is approved by the Authority, a change will be raised to include the Distributor in the new flow.</p>

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Utility Warehouse	Non-confidential	Yes	Noted.
ScottishPower Energy Retail Ltd	Non-confidential	We do not agree with this change proposal, therefore don't agree with the works.	Noted.
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.	Noted.
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.	Noted.
IMServ Europe Ltd	Non-confidential	Yes	Noted.
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.	Noted.
SSE Energy Supply Ltd	Non-confidential	Yes	Noted.
Western Power Distribution	Non-confidential	Yes	Noted.

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British Gas	Non-confidential	We agree that the permitted works for a SIP should be limited to the works detailed in Section 4.5	Noted.
SP Distribution plc and SP Manweb plc	Non-confidential	Yes	Noted.
<p>Working Group Conclusions:</p> <p>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:</p> <ul style="list-style-type: none"> • They will get outage alerts and if they did not know this is a SIP activity, they may send out someone to investigate; and • it would provide details to help establish who last worked on that asset should any safety events happen after work is completed. <p>The Working Group considered the above and more details are provided in Section 6 of the Change Report.</p>			

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?	Working Group Comments
Electrical Safety First	Non-confidential	None	Noted.
Cheshire Peaks & Plains Housing Trust	Non-confidential	No	Noted.

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Utilita Energy Limited	Non-confidential	No	Noted.
Alt HAN Co Ltd.	Non-confidential	No	Noted.
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.	Noted.
BUUK Infrastructure Limited	Non-confidential	No	Noted.
Northern Powergrid	Non-confidential	No	Noted.
The National Association of Professional Inspectors and Testers	Non-confidential	No comments.	Noted.
Electrical Safety Roundtable (Social Housing sub-group)	Non-confidential	No comment.	Noted.

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Southern Electric Power Distribution plc (SEPD) & Scottish Hydro Electric Power Distribution plc (SHEPD)	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	This is addressed in the Working Group response to Question 3.
Utility Warehouse	Non-confidential	No	Noted.
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.	<p>Within the proposed DCP 394 legal text there is a clause regarding liability:</p> <p>The Safe Isolation Provider shall indemnify the Company and the Electricity Supplier 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 Safe Isolation Provider in exercising the Safe Isolation Provider's rights under this Clause 52W (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).</p>

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			<p>The second point is addressed within the REC:</p> <p>Following completion of SIP Works at a premises, it is proposed that the SIP shall send a Market Message to the Registered Supplier (electricity) to confirm that the SIP Works have been completed.</p> <p>There will be a separate Market Message for where communications can't be restored to the same condition as before the SIP commenced work.</p> <p>In relation to pre payment, if a customer raised a concern the SIP would recommend they refer to their Supplier.</p>
EDF Energy Customers Ltd	Non-confidential	No Comments to the proposed provision in Section G of the legal text.	Noted.
UK Power Networks	Non-confidential	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.	DCP 394 does not provide the necessary permissions from BNOs. 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

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		<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> <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>customers installations is not the Distributor, the SIP would need to seek additional approval from the BNO to undertake Safe Isolation Work.</p> <p>This is addressed under the Working Groups response to Question 3.</p> <p>If the SIP did use contractors, they are ultimately responsible and liable. There are assurance processes within REC MOCOP.</p>
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		<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>	<p>The WG acknowledge it would be appropriate to include online notification facilities, but believe it is out of the scope of this change. A wider review and further housekeeping change would be needed.</p> <p>The REC technical solution is to provide the facility for the distributor to send a flow back to the SIP. Therefore, this will eliminate the risk of unsolicited data flows.</p> <p>DCP 394 legal text does not currently place any SLA requirement on distributors in relation to responding to category B.</p> <p>Once the REC technical solution is implemented there will be a new market role for SIP and therefore when a SIP sends through a category B</p>
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			notification, Distributors will be able to clearly identify this as SIP activity.
IMServ Europe Ltd	Non-confidential	No comment – insufficient time for our Legal team to review	Noted.
E.on Next Ltd & npower Commercial Gas Ltd.	Non-confidential	No comments	Noted.
SSE Energy Supply Ltd	Non-confidential	No	Noted.
Western Power Distribution	Non-confidential	No	Noted.
British Gas	Non-confidential	We do not have any comments on the proposed provision of information clauses set out in section 2G	Noted.
SP Distribution plc and SP Manweb plc	Non-confidential	Paragraph 52X.5 – notification by telephone – how are contact numbers communicated? The obligation should only end when the appropriate person/team within the Company has been notified.	As the SIP is an existing MEM it will use its existing contacts for Distributor communications.
Working Group Conclusions:			

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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.

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.

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

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

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.	Working Group Comments
Electrical Safety First	Non-confidential	N/A	Noted.
Cheshire Peaks & Plains Housing Trust	Non-confidential	Yes	Noted.
Utilita Energy Limited	Non-confidential	Yes	Noted.
Alt HAN Co Ltd.	Non-confidential	No comment	Noted.

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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.	Noted.
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.	The WG rationale is that this follows existing liability clauses contained within DCUSA.
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.	Noted.
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.	Noted.
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.	Noted.
Southern Electric Power Distribution plc (SEPD) & Scottish Hydro Electric Power	Non-confidential	Yes, I agree	Noted.

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Distribution plc (SHEPD)			
Utility Warehouse	Non-confidential	Yes	Noted.
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.	<p>Following completion of SIP Works at a premises, it is proposed that the SIP shall send a Market Message to the Registered Supplier (electricity) to confirm that the SIP Works have been completed.</p> <p>There will be a separate Market Message for where communications can't be restored to the same condition as before the SIP commenced work.</p>
EDF Energy Customers Ltd	Non-confidential	Yes, I agree the same principles as existing DCUSA between DNO, IDNO & Electricity suppliers.	Noted.
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>The Working Group note that this should sit out of scope of this CP.</p> <p>WG acknowledges a review of the liability cap is required. However, it is</p>

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		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>believed that this is outside the scope of this change.</p> <p>If DCP 394 is approved, it gives the SIP permission to work on distributor assets, however it is noted that not all points of isolation are owned by the DNO and are owned by the BNO. If owned by the BNO, the SIP will need to ensure they have the correct permissions in place, as it is not covered under DCUSA.</p>
IMServ Europe Ltd	Non-confidential	No comment – insufficient time for our Legal team to review	Noted.
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	Noted.
SSE Energy Supply Ltd	Non-confidential	Yes	Noted.
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.	WG acknowledges a review of the liability cap is required. However this is outside the scope of the change.

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British Gas	Non-confidential	We agree that the liability clause within Section 2G should follow the same principle as existing DCUSA arrangements.	Noted.
SP Distribution plc and SP Manweb plc	Non-confidential	Yes	Noted.
<p>The Working Group Conclusions:</p> <p>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.</p> <p>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.</p> <p>The Working Group considered the above and more details are provided in Section 6 of the Change Report.</p>			

Company	Confidential/ Anonymous	6. Do you have any other comments on the proposed legal text for DCP 394?	Working Group Comments
Electrical Safety First	Non-confidential	No – fully supportive	Noted.
Cheshire Peaks & Plains Housing Trust	Non-confidential	No	Noted.
Utilita Energy Limited	Non-confidential	No further comments.	Noted.

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Alt HAN Co Ltd.	Non-confidential	No	Noted.
Electricity North West	Non-confidential	<p>4.2.4 What does 'qualified' add? Are there some MEMS which are not qualified?</p> <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>REC schedule 9 refers to qualifications, and therefore this terminology is appropriate.</p> <p>WG agreed that SIP parties should be able to raise and vote on changes related specifically to section 2G. There is precedent within DCUSA that you do not have to be panel members or contribute to DCUSA costs to vote on specific clauses related to your party. E.g. Gas Suppliers.</p> <p>WG has defined safe isolations work as below.</p> <p>Means, in respect of an Entry/Exit Point, works by a SIP Party to:</p> <ul style="list-style-type: none"> (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

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		<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>meter, customer tails having been presented and tested by electrical contractor as part of their works</p> <p>(d) Re-energise that Entry/Exit Point.</p> <p>The WG believe that the phrase 'to the extent reasonably required in order to do so' is there to ensure that the SIP only undertakes work to complete a safe isolation. For example they may not need to adjust meter tails.</p> <p>52W.5.1 – the intent of this clause is to state that the SIP will undertake the safe isolation works at their own cost. The mechanism for recovering the cost for this will be under their commercial contracts.</p> <p>52W.7 – the intent of this clause is to state that a SIP party can only undertake safe isolation works (as defined in the proposed DCP 394 legal text) and nothing else.</p> <p>52W.9 follows the same principle as existing liability clauses within DCUSA. As noted above, the WG believe that</p>
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		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.	any proposed changes to liability sit out of scope of DCP 394. 52 X – These clauses follow the same principle as existing provision of information clauses set out in, for example, Section 2A. It would not be appropriate to make reference to “Provision of Information” Clauses in as an example Section 2A as this relates to a different legal relationship.
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.	WG believe that the requirement for Suppliers to publish their processes covers this.
Northern Powergrid	Non-confidential	No	Noted.
The National Association of Professional Inspectors and Testers	Non-confidential	No comments.	Noted.
Electrical Safety Roundtable	Non-confidential	No comment	Noted.

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(Social Housing sub-group)			
Southern Electric Power Distribution plc (SEPD) & Scottish Hydro Electric Power Distribution plc (SHEPD)	Non-confidential	No further comments	Noted.
Utility Warehouse	Non-confidential	No	Noted.
ScottishPower Energy Retail Ltd	Non-confidential	No	Noted.
EDF Energy Customers Ltd	Non-confidential	I have no further comments to add for DCP 394.	Noted.
UK Power Networks	Non-confidential	No	Noted.
IMServ Europe Ltd	Non-confidential	No comment – insufficient time for our Legal team to review	Noted.
E.on Next Ltd & npower	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) 	This has been addressed under a previous comment. There is a flow for

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Commercial Gas Ltd.		<ul style="list-style-type: none"> - 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>	<p>the SIP to send to the Supplier noting an issue with the meter.</p> <p>The WG acknowledge that it will be the MEMs responsibility to ensure they can resource the demands.</p> <p>This has been captured under the REC.</p>
SSE Energy Supply Ltd	Non-confidential	No	Noted.
Western Power Distribution	Non-confidential	No	Noted.
British Gas	Non-confidential	We do not have any further comments	Noted.
SP Distribution plc and SP Manweb plc	Non-confidential	Paragraph 4.24. – what defines a party is a “qualified metering equipment manager”, is there are defined term that could be used here.	This refers to the requirement for parties to accede to the REC as a Metering Equipment Managers, to

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			enable them to become a Safe Isolations Provider.
<p>Working Group Conclusions:</p> <p>The majority of responses did not include any further comments on the legal text, however several responses raised questions that the WG have addressed above.</p>			

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.	Working Group Comments
Electrical Safety First	Non-confidential	Yes	Noted.
Cheshire Peaks & Plains Housing Trust	Non-confidential	Yes	Noted.
Utilita Energy Limited	Non-confidential	Yes	Noted.
Alt HAN Co Ltd.	Non-confidential	No comment	Noted.
Electricity North West	Non-confidential	We believe that a SIP Party should be able to raise and vote on CPs related to Section 2G.	Noted.

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BUUK Infrastructure Limited	Non-confidential	Yes	Noted.
Northern Powergrid	Non-confidential	Yes	Noted.
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.	Noted.
Electrical Safety Roundtable (Social Housing sub-group)	Non-confidential	Yes, we agree that a SIP Party should be able to raise and vote on change proposals related to Section 2g.	Noted.
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.	Noted.
Utility Warehouse	Non-confidential	Yes	Noted.

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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.	The WG note this concern, however the majority of responders have indicated they are comfortable for SIPs to be able to raise and vote on CPs related to Section 2G. This is therefore the WG position.
EDF Energy Customers Ltd	Non-confidential	Yes I agree that a SIP should have CP voting rights related only to section 2G.	Noted.
UK Power Networks	Non-confidential	Yes, but not outside 2G	Noted.
IMServ Europe Ltd	Non-confidential	Yes	Noted.
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.	Noted.
SSE Energy Supply Ltd	Non-confidential	Yes	Noted.
Western Power Distribution	Non-confidential	Yes	Noted.

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British Gas	Non-confidential	We agree that a SIP Party should be able to raise and vote on CPs related to Section 2G	Noted.
SP Distribution plc and SP Manweb plc	Non-confidential	Yes	Noted.
<p>Working Group Conclusions:</p> <p>All responses except one agreed that a SIP Party should be able to raise and vote on CPs related to Section 2G. The WG note this concern, however the majority of responders have indicated they are comfortable for SIPs to able to raise and vote on CPs related to Section 2G. This is therefore the WG position.</p>			

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.	Working Group Comments
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.	Noted.
Cheshire Peaks & Plains Housing Trust	Non-confidential	Yes	Noted.
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	Noted.

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		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	Noted.
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. 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>	<p>Noted.</p> <p>Should DCP 394 be approved, the WG will consider appropriate communications/publications.</p>
BUUK Infrastructure Limited	Non-confidential	Yes	Noted.
Northern Powergrid	Non-confidential	Yes. Please see comment in Q13.	Noted.
The National Association of Professional	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	Noted.

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Inspectors and Testers		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	<p>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.</p> <p>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.</p>	Noted.
Southern Electric Power Distribution plc (SEPD) & Scottish Hydro Electric Power Distribution plc (SHEPD)	Non-confidential	Yes, I agree.	Noted.
Utility Warehouse	Non-confidential	Yes	Noted.
ScottishPower Energy Retail Ltd	Non-confidential	Yes.	Noted.
EDF Energy Customers Ltd	Non-confidential	Yes I agree with this.	Noted.

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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.	Noted.
IMServ Europe Ltd	Non-confidential	Yes	Noted.
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.	Noted.
SSE Energy Supply Ltd	Non-confidential	Yes	Noted.
Western Power Distribution	Non-confidential	Yes, and this needs to be clearly advertised/identifiable on websites	Noted. Requirement is outlined in the legal text.
British Gas	Non-confidential	We agree that a customer should be able to contact their Electricity Supplier obtain a safe isolation for safe working	Noted.
SP Distribution plc and SP Manweb plc	Non-confidential	Yes	Noted.

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Working Group Conclusions:

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.

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 the Change Report.

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 of the Change Report.

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.	Working Group Comments
Electrical Safety First	Non-confidential	Yes	Noted.
Cheshire Peaks & Plains Housing Trust	Non-confidential	Yes	Noted.
Utilita Energy Limited	Non-confidential	Yes, we are not aware of any changes needed to the SEC in order to implement DCP 394	Noted.
Alt HAN Co Ltd.	Non-confidential	No comment	Noted.

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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.	Noted.
BUUK Infrastructure Limited	Non-confidential	Yes	Noted.
Northern Powergrid	Non-confidential	Yes	Noted.
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.	Noted.
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.	Noted.
Southern Electric Power Distribution plc (SEPD) & Scottish Hydro Electric Power Distribution plc (SHEPD)	Non-confidential	Yes, I agree	Noted.

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Utility Warehouse	Non-confidential	Yes	Noted.
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	The WG noted that if there was a comms hub issue, the SIP would send a flow to the Electricity Supplier and would tell the customer to contact the Supplier. This will be addressed in a guidance document.
EDF Energy Customers Ltd	Non-confidential	Yes I agree no change to the Smart Energy Code is required if DCP 394 is approved.	Noted.
UK Power Networks	Non-confidential	We think this may be an issue for suppliers only.	Noted.
IMServ Europe Ltd	Non-confidential	Yes	Noted.
E.on Next Ltd & npower Commercial Gas Ltd.	Non-confidential	Yes	Noted.
SSE Energy Supply Ltd	Non-confidential	Yes	Noted.

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Western Power Distribution	Non-confidential	Yes	Noted.
British Gas	Non-confidential	We agree that no change is required to the Smart Energy Code	Noted.
SP Distribution plc and SP Manweb plc	Non-confidential	No comment	Noted.
Working Group Conclusions: 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. The WG noted that this will be covered within a guidance document.			

Company	Confidential/Anonymous	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.	Working Group Comments
Electrical Safety First	Non-confidential	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	Noted.

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		<p>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.	Noted.
Utilita Energy Limited	Non-confidential	Yes, DCP 394 best facilitates effective competition in the supply of electricity, which aligns with DCUSA second General Objective.	Noted.
Alt HAN Co Ltd.	Non-confidential	No comment	Noted.
Electricity North West	Non-confidential	<p>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.</p> <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>	Noted.

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		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.	The WG noted that if approved, DNOs would be able to point customers to the Supplier's websites.
BUUK Infrastructure Limited	Non-confidential	Yes	Noted.
Northern Powergrid	Non-confidential	Yes – 1 and 2 for the reasons outlined in the proposal	Noted.
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.	Noted.
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.	Noted.
Southern Electric Power Distribution plc (SEPD) & Scottish Hydro Electric Power	Non-confidential	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.	This has been covered in previous responses.

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Distribution plc (SHEPD)		General objective 2 is positive in that it will enable wider choice and prompt isolations to be carried out.	
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>	Noted.
ScottishPower Energy Retail Ltd	Non-confidential	No, we believe this CP will create risk although we understand the rationale behind the CP.	Noted.
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>	Noted.

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		<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> <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	<p>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</p>	Noted.

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		communication and recording of the notification data is provided that this would be a "Positive" rather than "Neutral".	
IMServ Europe Ltd	Non-confidential	Yes	Noted.
E.on Next Ltd & npower Commercial Gas Ltd.	Non-confidential	Yes	Noted.
SSE Energy Supply Ltd	Non-confidential	(No entry)	Noted.
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.	Noted.
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>	Noted.

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		<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 	
SP Distribution plc and SP Manweb plc	Non-confidential	Yes, we consider the objectives 1 and 2 are better facilitated for the reasons given in the Consultation.	Noted.
Working Group Conclusions:			

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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 of the Change Report.

Company	Confidential/ Anonymous	11. Are you aware of any wider industry developments that may impact upon or be impacted by this CP?	Working Group Comments
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.	The WG noted that this scheme is on hold and will be reviewed following a decision on this DCP.
Cheshire Peaks & Plains Housing Trust	Non-confidential	No	Noted.
Utilita Energy Limited	Non-confidential	No	Noted.
Alt HAN Co Ltd.	Non-confidential	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	Noted.

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		<p>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.	Noted.
BUUK Infrastructure Limited	Non-confidential	No	Noted.
Northern Powergrid	Non-confidential	No	Noted.
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.	Noted.
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.	Noted.
Southern Electric Power	Non-confidential	No	Noted.

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Distribution plc (SEPD) & Scottish Hydro Electric Power Distribution plc (SHEPD)			
Utility Warehouse	Non-confidential	Yes	Noted.
ScottishPower Energy Retail Ltd	Non-confidential	No.	Noted.
EDF Energy Customers Ltd	Non-confidential	No, I am not aware of any further developments that may impact or be impacted by this CP.	Noted.
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), 	<p>Noted.</p> <p>This has been addressed under Question 3.</p> <p>The WG are not aware of any barriers to parties becoming multiple party types.</p>

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		<p>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.</p> <p>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.</p>	The WG agree that they believe the solution is justified/appropriate and that if Suppliers approve the change, they are in agreement that it is in line with the principle.
IMServ Europe Ltd	Non-confidential	It would benefit the proposed ALT-HAN crowded meter room project, which is proposed to commence in 2023	Noted.
E.on Next Ltd & npower Commercial Gas Ltd.	Non-confidential	No	Noted.
SSE Energy Supply Ltd	Non-confidential	No	Noted.
Western Power Distribution	Non-confidential	CP400 Crowded Meter Rooms works	Noted.

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British Gas	Non-confidential	We are not aware of any wider industry developments that may impact upon this CP	Noted.
SP Distribution plc and SP Manweb plc	Non-confidential	No comment	Noted.
<p>Working Group Conclusions:</p> <p>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.</p> <p>One respondent raised concerns in relation to competition law. Another comment received noted that they believed that without the appropriate communication to the supplier, the isolation activity through an independent SIP is contrary to their expectations of the supplier hub principle. These concerns are addressed under section 6 of the Change Report.</p>			

Company	Confidential/ Anonymous	12. Do you agree with the Working Group's proposed indicative implementation date? Please provide your rationale.	Working Group Comments
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.	Noted.
Cheshire Peaks & Plains Housing Trust	Non-confidential	Yes, just to get any implementation decision in 2022 is a bonus.	Noted.
Utilita Energy Limited	Non-confidential	Yes	Noted.

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Alt HAN Co Ltd.	Non-confidential	No comment	Noted.
Electricity North West	Non-confidential	Yes, we agree with the proposed indicative implementation date.	Noted.
BUUK Infrastructure Limited	Non-confidential	Yes	Noted.
Northern Powergrid	Non-confidential	Yes	Noted.
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.	Noted.
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.	Noted.
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.	Noted.

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Southern Electric Power Distribution plc (SEPD) & Scottish Hydro Electric Power Distribution plc (SHEPD)	Non-confidential	Yes, I agree.	Noted.
Utility Warehouse	Non-confidential	We agree that this modification should be implemented in the next earliest release	Noted.
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.	Noted.
EDF Energy Customers Ltd	Non-confidential	Yes, I agree with the proposed implementation date.	Noted.
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.	Noted.
IMServ Europe Ltd	Non-confidential	Yes	Noted.
E.on Next Ltd & npower	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	Noted.

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Commercial Gas Ltd.		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.	Noted.
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.	Noted.
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>	The WG note the concerns however agree that interim/alternative communications would not be appropriate and that a November 2022 implementation date would not allow sufficient time for system changes.

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SP Distribution plc and SP Manweb plc	Non-confidential	Yes, as long as the relevant systems changes have been implemented. The implementation date should be aligned to these changes.	Noted.
<p>Working Group Conclusions:</p> <p>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 WG consider what would be required to allow an earlier implementation date, possibly using alternative communication methods. Considerations are outlined in section 6 of the Change Report.</p>			

Company	Confidential/ Anonymous	13. Do you have any other comments in relation to DCP 394?	Working Group Comments
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.	Noted.
Cheshire Peaks & Plains Housing Trust	Non-confidential	No	Noted.
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.	Noted.
Alt HAN Co Ltd.	Non-confidential	None	Noted.

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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.	As noted in response to a previous comment, should DCP 394 be approved, the WG will consider appropriate communications/publications. A list of SIPs will also be available on the REC portal.
BUUK Infrastructure Limited	Non-confidential	No	Noted.
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>	<p>It is a requirement within the solution that SIPs will need to be REC accredited MEMs.</p> <p>WG agree that the term 'SIP of last resort' requires clarity. The Supplier is not necessarily the last resort, a customer is able to refer to the Supplier in the first instance.</p>
The National Association of	Non-confidential	The National Association of Professional Inspectors and Testers members survey clearly demonstrates the issues and concerns with the current	Noted.

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Professional Inspectors and Testers		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) & Scottish Hydro Electric Power Distribution plc (SHEPD)	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.	<p>The below clause will be included within the REC:</p> <p>Following completion of SIP Works at a premises, the SIP shall send a Market Message to the Registered Supplier (electricity) to confirm that the SIP Works have been completed.</p> <p>The WG are considering further, how such notification should be made to the DNO.</p>
Utility Warehouse	Non-confidential	(No entry)	Noted.
ScottishPower Energy Retail Ltd	Non-confidential	No.	Noted.
EDF Energy Customers Ltd	Non-confidential	No further comments.	Noted.
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. 	<ol style="list-style-type: none"> 1. Addressed under Question 3. 2. Addressed under Question 3.

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		<p>3. Activities on BNO Networks.</p> <p>4. SIPS limitations on liability and ensuring the SIPS have a sufficiently high public liability insurance to meet liabilities.</p> <p>5. The possible competition law challenge from independent LCT companies</p> <p>6. The "Supplier Hub Principle" challenge</p> <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>	<p>3. Addressed under Question 4.</p> <p>4. WG agree that this should form part of the wider review around liability that is out of scope of this change.</p> <p>5. This was addressed under question 11.</p> <p>6. This was addressed under question 11.</p>
IMServ Europe Ltd	Non-confidential	None	Noted.
E.on Next Ltd & npower Commercial Gas Ltd.	Non-confidential	No comments	Noted.
SSE Energy Supply Ltd	Non-confidential		Noted.
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</p>	Noted.

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		REC change cannot address these concerns, then we believe the decision to Implement DCP394 should be post R0021.	
Western Power Distribution	Non-confidential	No	Noted.
British Gas	Non-confidential	We have no other comments	Noted.
SP Distribution plc and SP Manweb plc	Non-confidential	None	Noted.
<p>Working Group Conclusions:</p> <p>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 addressed this within section 6 of the Change Report.</p> <p>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.</p>			