





DCUSA Consultation		At what stage is this document in the process?
<h1>DCP 446</h1> <h2>Emergency Disconnections</h2> <p>Date raised: 7 November 2024</p> <p>Proposer Name: Mark Rose</p> <p>Company Name: Eastern Power Networks</p> <p>Company Category: DNO</p> <p>Governance: Part 1 Matter</p>		01 – Change Proposal
		02 – Consultation
		03 – Change Report
		04 – Change Declaration
<p>Purpose of Change Proposal</p> <p>The intent of this Change Proposal (“CP”) is to enable distributors to charge customers covered by section 2 of the National Terms of Connection (“NTC”) for emergency de-energisations or disconnections that are required for safety reasons or are requested by emergency services.</p>		
	<p>This document is a Consultation issued to DCUSA Parties and any other interested Parties in accordance with Clause 11.14 of the DCUSA seeking industry views on DCP 446.</p> <p>The Working Group recommends that this Change Proposal should proceed to Consultation.</p> <p>Parties are invited to consider the questions set in section 10 and submit comments using the form attached as Attachment 2 to dcusa@electralink.co.uk by 28 January 2025.</p>	
	<p>Impacted Parties</p> <p>DNOs and IDNOs</p>	
	<p>Impacted Clauses</p> <p>Schedule 2B – Section 2, Clause 7.4</p> <p>Schedule 2B – Section 3, Clauses 5.7 and 6.3</p> <p>Schedule 2B – Section 4, Clauses 5.7 and 6.3</p>	

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Timetable		
Activity	Date	
Initial Assessment Report	20 November 2024	
Consultation Issued to Parties	07 January 2025	
Change Report Approved by Panel	16 April 2025	
Change Report issued for Voting	17 April 2025	
Party Voting Closes	8 May 2025	
Change Declaration Issued	12 May 2025	



Any questions?

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Proposer

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1 Summary

What?

- 1.1 In order to support network cost allocation more appropriately, provision for emergency disconnection charging should be broadened to support recovery of costs across all strands of the National Terms of Connection rather than being made explicit for larger connections only, as described in sections 3 and 4 of the National Terms of Connection (Schedule 2B).

Why?

- 1.2 There is inconsistency between sections 2, 3 and 4 of the NTC. Sections 3 (Clause 6.3) and 4 (Clause 6.3) supports the recovery of costs associated with undertaking emergency disconnections but section 2 is silent on this issue. Accordingly, costs for many emergency disconnections are currently socialised across all network users.

How?

- 1.3 Consider simplification of wording included in paragraph 6.3 of both section 3 and section 4 for introduction into section 2 of the National Terms of Connection (Schedule 2B)

2 Governance

- 2.1 This CP satisfies the criteria for a Part 1 Matter as it impacts all customers by amending the NTC.
- 2.2 This consultation is issued for a period of 15 working days.

3 Why Change?

- 3.1 The proposed changes to the NTC will support the recovery of costs from the customer and avoid the socialisation of these costs across other network users.
- 3.2 The costs of emergency works which would be recovered are typically more expensive than the costs for planned works, which means this change will act as an incentive for customers to follow correct processes, potentially reducing the number of safety issues resulting from customers' actions.

4 Working Group Assessment

Working Group Assessment

- 4.1 The DCUSA Panel established a Working Group to assess this CP. 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 The Proposer walked the Working Group through the change and explained that many emergency jobs are required due to unsafe conditions being caused by customers, or their agents. The Proposer showed examples, which can be found attached to this consultation as attachment 4, including a meter attached to an electricity pole, a meter and cutout being left exposed to the elements, and a live supply cable being left on the ground and driven over by vehicles.
- 4.3 The Proposer explained that there are currently no strong provisions in the NTC for the costs of the emergency works to be recovered and therefore no incentive for customers to follow the correct processes.
- 4.4 The Proposer explained that de-energisations and disconnections may also be required when requested by the authorities, such as the police, due to illegal activities, the costs of which are difficult to recover.
- 4.5 The Proposer walked the Working Group through the process at a high level and explained that no changes were being made to the way that costs would be recovered and that costs are recovered directly by the DNO/IDNO and are not passed onto Suppliers.
- 4.6 The Proposer explained that the draft legal text does not make it mandatory for DNOs and IDNOs to recover the costs, allowing for each DNO or IDNO to determine its own policies in relation to the recovery of the costs.

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

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

- 4.7 The Working Group discussed that de-energisations may also be performed for the same reasons, rather than a full disconnection, and that this should be included in the scope of the CP.
- 4.8 The Working Group agreed that where a safety related de-energisation or disconnection was necessary as a result of a DNO's or IDNO's actions or equipment, that costs would be borne by the DNO's regulatory allowance.
- 4.9 The Working Group discussed whether costs would be recovered from Suppliers if it was their agents that caused the need for an emergency de-energisation or disconnection. The Working Group noted that the DCUSA contains provisions for indemnities against damage to network equipment by Suppliers or their agents. The Working Group agreed that Suppliers actions, or the actions of their agents, does not need to be covered by the NTC and was out of scope of this CP.
- 4.10 The Working Group discussed whether provisions for recovering the costs of a reconnection were needed in the NTC, similar to the provisions for recovering costs for re-energising a supply. The Working Group noted that the DCUSA already contains provisions for charging for connections and, as such, no additional provisions would be required under the NTC.
- 4.11 The Working Group updated Schedule 2B, Section 2 Paragraph 7, Section 3 Paragraphs 5.7 and 6.3, and Section 4 Paragraphs 5.7 and 6.3, to support the recovery of reasonable costs incurred

by DNOs and IDNOs for the de-energisation or disconnection for safety reasons or when requested by emergency services. These changes can be found in the draft legal text amendments attached to this consultation as attachment 1.

Question 3 – Do you agree that DNOs and IDNOs should be able to recover costs as a result of de-energising or disconnecting the supply and should DNOs and IDNOs be able to recover costs for disconnecting a supply for safety reasons, legal reasons or both? Please provide your rationale.

4.12 The Working Group discussed whether there were any other reasons for which the supply may be disconnected or de-energised that DNOs and IDNOs should be able to recover costs for, for example safety reasons arising from a force majeure/Act of God.

Question 4 – Are there any other reasons for emergency disconnections or de-energisations (e.g., force majeure/Act of God) that DNOs and IDNOs should be able to recover costs for? Please provide your rationale.

5 Relevant Objectives

Assessment Against the DCUSA Objectives

- 5.1 For a DCUSA Change Proposal to be approved it must be demonstrated that it better facilitates the DCUSA Objectives. This CP is being assessed against the DCUSA General Objectives.
- 5.2 The Proposer considers that the following DCUSA General Objectives are better facilitated by this CP:

	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 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	None
<input checked="" type="checkbox"/>	3. The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences	Positive
<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 Co-operation of Energy Regulators.	None

- 5.3 The Proposer believes the change will support DNOs and IDNOs in the recovery of costs directly from customers needing emergency disconnection or de-energisation as opposed to socialisation of these costs across all users of the distribution system.
- 5.4 The Proposer believes the change will discourage unsafe practices by passing on the costs of emergency works to the specific customers requiring the works, which would be more expensive than the planned work that would have taken place had the customers followed the correct processes.

Question 5 – Do you consider that the proposal better facilitates the DCUSA General Objectives? Please give supporting reasons.

6 Impacts & Other Considerations

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

- 6.1 This CP is not believed to impact any significant industry change projects or SCRs.

Consumer Impacts

- 6.2 The Proposer believes this change would positively impact on consumers as it would avoid some costs for emergency de-energisations and disconnections from being socialised across all network users, instead recovering costs directly from accountable customers.

Environmental Impacts

- 6.3 In accordance with DCUSA Clause 11.14.6, the Working Group assessed whether there would be a material impact on greenhouse gas emissions if this CP was implemented. The Working Group did not identify any material impact on greenhouse gas emissions from the implementation of this CP.

Question 6 – Are you aware of any wider industry developments that may impact upon or be impacted by this CP?

7 Implementation

- 7.1 This CP will be implemented in the next standard DCUSA release following Authority approval.

Question 7 – Are you supportive of the proposal to implement this CP in the next standard DCUSA release following Authority approval?

8 Legal Text

- 8.1 The legal text for this CP is provided as Attachment 1.
- 8.2 Text has been added to the end of Paragraph 7 of Section 2 of Schedule 2B to support the recovery of reasonable costs incurred by DNOs and IDNOs for a de-energisation or disconnection that was:
- 8.2.1 carried out for safety reasons not caused by the DNO or IDNO; or
- 8.2.2 was requested by emergency services.
- 8.3 Paragraph 5.7 of Section 3 of Schedule 2B has been amended to expand coverage of the paragraph to customers' agents and to requests made by emergency services.
- 8.4 Paragraph 6.3 of Section 3 of Schedule 2B has been amended to include disconnections made at the request of emergency services and has been simplified to state where a disconnection is necessary for safety reasons.
- 8.5 Paragraph 5.7 of Section 4 of Schedule 2B has been amended to expand coverage of the paragraph to customers' agents and to requests made by emergency services.
- 8.6 Paragraph 6.3 of Section 4 of Schedule 2B has been amended to include disconnections made at the request of emergency services and has been simplified to state where a disconnection is necessary for safety reasons.

Question 8 – Do you have any comments on the draft legal text?

9 Consultation Questions

- 9.1 The Working Group is seeking industry views on the following consultation questions:

No.	Questions
1	Do you understand the intent of the CP?
2	Are you supportive of the principle of the CP?
3	Do you agree that DNOs and IDNOs should be able to recover costs as a result of de-energising or disconnecting the supply and should DNOs and IDNOs be able to recover costs for disconnecting a supply for safety reasons, legal reasons or both? Please provide your rationale.
4	Are there any other reasons for emergency disconnections or de-energisations (e.g., force majeure/Act of God) that DNOs and IDNOs should be able to recover costs for? Please provide your rationale.

5	Do you consider that the proposal better facilitates the DCUSA General Objectives? Please give supporting reasons.
6	Are you aware of any wider industry developments that may impact upon or be impacted by this CP?
7	Are you supportive of the proposal to implement this CP in the next standard DCUSA release following Authority approval?
8	Do you have any comments on the draft legal text?

9.2 Responses should be submitted using Attachment 2 to dcusa@electralink.co.uk by no later than 28 January 2025.

9.3 Responses, or any part thereof, can be provided in confidence. Parties are asked to clearly indicate any parts of a response that are to be treated confidentially.

10 Attachments

- Attachment 1 – DCP 446 Legal Text
- Attachment 2 – DCP 446 Consultation Response Form
- Attachment 3 – DCP 446 Change Proposal Form
- Attachment 4 – UKPN Examples Presentation