

ENA Fuse Upgrade Project

COLLATED RFI RESPONSES WITH STANDING ISSUES GROUP COMMENTS

| Company | Confidential/ Anonymous | 1. In what ways do you communicate with DNOs? For what purposes you are using these systems and what are their benefits? Currently, we have identified the DTN and ENA Connect Direct as potential mechanisms for audit trail and we are keen to get your views on these systems or any others that we may not be aware of. | Working Group Comments |
|--------------|----------------------------|--|---|
| EDF | Non-confidential | <p>EDF communicates with DNOs via the DTN, regional email portals, and direct escalation channels for service fuse issues and safety notifications.</p> <p>We are aware that ENA Connect Direct is being considered as an audit-trail option, though EDF does not currently use it operationally.</p> <p>Any new communication mechanism would need to demonstrate clear efficiency or value beyond existing DTN arrangements.</p> | DTN, regional email portals and direct escalation channels. |
| Confidential | Confidential | <p>We use ENA Connect Direct for managing connection notifications for the installation of low-carbon technologies. We consider that there are a number of issues and areas for improvement. They include:</p> <ul style="list-style-type: none"> • Lack of centralised inbox access: responses and updates are only received by the submitting user, so messages are sometimes missed during staff absence (annual leave or sickness), which is difficult for a multi-team operation. • Limited visibility of DNO updates: in many cases, the DNO completes work (including fuse upgrades) without updating Connect Direct, leaving applications stuck in the 'more information required' status. • No consistent communication feedback loop: in some cases, after using Connect Direct we are redirected to the DNO's own portal, removing any efficiency benefit. In our view, the Connect Direct | ENA connect |

ENA Fuse Upgrade Project

COLLATED RFI RESPONSES WITH STANDING ISSUES GROUP COMMENTS

| | | | |
|--------------------------------------|-------------------------|---|--|
| | | platform has potential to be an effective tool, yet it continues to operate as a consolidation of each individual DNO portal, rather than seeking to standardise the different processes. | |
| Haste Ltd | Non-Confidential | Haste Ltd communicate directly with the DNO departments and scheduling systems normally via e-mail and or direct systems links from DNO to Haste Ltd's CRM systems. We do this for the purpose of complete Supply Point Testing / Cut Out Surveys <u>and upgrading the mains fuse</u> . If all testing is to network standards and all apparatuses at the supply point meets the DNO specification requirements we upgrade the Fuse on behalf of the DNO. (Hastes operatives have appropriate Supply Point Testing Competency issued by the DNO they are working for). Haste Ltd Train Supply Point Testing and Cut Surveys for Fuse upgrades this is approved by the DNO's we work for, the DNO's carry out Operative assessment after the training at Haste and issue a DNO competency certificate when an Operative passes: Onsite the task of upgrading the mains fuse is not carried out at the same time as a SIP isolator installation, customer requests for a SIP isolator to be installed is a separate job all together, Haste Ltd do SIP isolator installs as per our MEM REC registration. | Directly |
| Confidential (MEM with SIP approval) | Confidential | <p>As an approved Electricity Metering Operative with CoMCoP and Safe Isolation Provider with under the Retail Energy Code (REC), we maintain robust communication channels with Distribution Network Operators (DNOs) to ensure safe, compliant, and efficient operations.</p> <p>Our primary communication methods include:</p> <ul style="list-style-type: none"> - Send and receive Market Messages through the Data Transfer Network (DTN) - Market Participant Identifier (MPID) | DTN usually, telephone calls for urgent queries, email to share info |

ENA Fuse Upgrade Project

COLLATED RFI RESPONSES WITH STANDING ISSUES GROUP COMMENTS

| | | | |
|--------------------|---------------------|--|---------------------|
| | | <ul style="list-style-type: none"> - Obtain accreditation to work as an Electricity Metering Operative with CoMCoP - BSC for Role Code "Y" (SIP) <p>Direct Telephone Communication: For urgent matters, such as unplanned outages, safety concerns during isolation procedures, or immediate support requirements, we utilize direct telephone lines to ensure swift responses and coordination.</p> <p>Email Communication: Email serves as a formal channel for routine updates, documentation exchange, and non-urgent inquiries. This includes sending method statements, risk assessments, and other relevant documentation related to meter exchanges and safe isolation activities.</p> | |
| British Gas | Non-Confidential | Our business follow the agreed industry STIRG document with regard to reporting A, B and C codes when sub-standard DNO assets are found on a site visit. Our Net Zero LCT business currently use the ENA Connect Direct mechanism so the chosen solution as an audit trail are currently used so should not involve a major impact on our systems. This can only be confirmed when a mechanism is agreed and review undertaken. | |
| Confidential (SIP) | Confidential | We currently communicate with the DNO for SIP work, installing isolators for our customers to enable the installation or heat pumps, solar panels and batteries. We also use the connect direct portal to submit maximum demand results for 'connect and notify' / 'notify and connect'. | ENA Connect Direct. |
| | | | |
| | | | |
| | | | |

ENA Fuse Upgrade Project

COLLATED RFI RESPONSES WITH STANDING ISSUES GROUP COMMENTS

Working Groups conclusions: There was a mixture of different communication channels that parties use to communicate with DNOs that were highlighted. These are below

- The DTN
- ENA Connect Direct
- Emails
- Telephone calls

In the instances of telephone calls, the responses suggested that these are mainly used when there is an urgent query as this is a more direct line of communication.

1.1 It was noted by one response that ENA Connect Direct had a number of issues and areas for improvement. They include:

- Lack of centralised inbox access: responses and updates are only received by the submitting user, so messages are sometimes missed during staff absence (annual leave or sickness), which is difficult for a multi-team operation.
- Limited visibility of DNO updates: in many cases, the DNO completes work (including fuse upgrades) without updating Connect Direct, leaving applications stuck in the 'more information required' status.
- No consistent communication feedback loop: in some cases, after using Connect Direct we are redirected to the DNO's own portal, removing any efficiency benefit. In our view, the Connect Direct platform has potential to be an effective tool, yet it continues to operate as a consolidation of each individual DNO portal, rather than seeking to standardise the different processes.

It was noted that the platform for the notices to be issued on must be standardised so that parties where not using different communication methods as this would be an inefficient process.

It was noted by a DNO SIIG member that whilst the DTN had been mentioned as the tried and tested method for sending notices to industry parties, not all parties or party categories are forced to use this so whichever platform is taken forwards would need to be fit for purpose for all parties and categories.

ENA Fuse Upgrade Project

COLLATED RFI RESPONSES WITH STANDING ISSUES GROUP COMMENTS

It was highlighted to the SIG that the notification process would be to tell the DNO that a job was happening, not asking for permission to carry out the fuse upgrade.

It was queried if the scope was only for the fuse upgrade, not for other jobs like a service cable upgrade and if so what mitigations are in place to ensure it's only the fuse that's upgraded and the fuse is only upgraded when it is safe to do so.

The ENA representative highlighted that this process will be limited to 80 amp fuses only and anything over that would have to be done via the DNO.

He went on to say that there is an energy recommendation document (ERED) that will give guidance on when a SIP or a MEM can upgrade the fuses and what processes they must follow. The training programme will reflect what's in the ERED)

| Company | Confidential/ Anonymous | 2. What are the benefits and challenges of the work under the proposed scope? | Working Group Comments |
|---------|----------------------------|--|------------------------|
| EDF | Non-confidential | <p>While the project could improve customer journeys in isolated cases, EDF considers the overall operational benefit to suppliers to be limited.</p> <p>Fuse upgrades are infrequent, and DNOs already perform this activity under existing arrangements.</p> <p>Transferring this responsibility to suppliers would introduce additional costs (training, tools, ELI testing equipment, stock management) without a proportionate benefit to EDF or our customers.</p> | |

ENA Fuse Upgrade Project

COLLATED RFI RESPONSES WITH STANDING ISSUES GROUP COMMENTS

| | | | |
|--|-------------------------|---|--|
| Confidential | Confidential | The Fuse Upgrade Project has the potential to improve a major inefficiency within the existing processes for installing low-carbon technologies and reduce administrative burdens and costs for installers. Any development of a single audit trail mechanism should be done alongside and be complementary to the work to improve existing DNO processes. | |
| Haste Ltd | Non-Confidential | <p>Challenges: - The specification of apparatuses in/on different DNO networks is different, network cable types supplying cut outs can be different in different areas, loop supplies configurations can vary: Each DNO can have a different approach to weather an upgrade is possible due to Metering and Customer Apparatus specifications and conditions. (Fuses Upgrade without these consideration being taken in to account could lead to a cut out fire)</p> <p>– The DNO's Haste Ltd work for do not allow Fuse upgrades on Loop supply's– Identifying Loop supplies can require access to neighbouring property's, Cat and Genny cable route identification, access to Net Maps, escalation to the DNO for further network investigations, in particular Over Head supply consideration require a knowledge of cable sizes and loop configuration which only the DNO will have records on and or the appropriately qualified Operative with OHS knowledge. Potentially registration with the EUSR is a bigger challenge than directly working for a DNO and will have more commercial implication in particular costs. Benefit: if no DNO authorisation is required SIP work and Fuse up grades could be offered as a one visit job to a customer.</p> | |
| Confidential (MEM with SIP approval) | Confidential | <p>Benefits:</p> <ul style="list-style-type: none"> - New line of work for the company - Expanding current work force - Supporting the industry <p>Challenges:</p> | |

ENA Fuse Upgrade Project

COLLATED RFI RESPONSES WITH STANDING ISSUES GROUP COMMENTS

| | | | |
|--------------------|---------------------|--|--|
| | | <ul style="list-style-type: none"> - We haven't yet seen the training program for the Engineers - Depending on the criteria of work, is field mentoring required with experienced engineers? | |
| British Gas | Non-Confidential | <p>The benefits are that LCT can be fitted without a significant delay to the customer and also that there is a clear confirmation from DNOs which properties and supply assets can have a fuse upgrade and which have to be referred to the DNO for action.</p> <p>The challenges could include the mandatory enrolment of engineers onto the EUSR platform where parties either do not enrol employees or only partially to satisfy the DNOs that require it to negate external assessment. This would have downtime and cost implications. Some parties would also have training centres already approved by EUSR so could they carry out this training in-house if the material was shared on a train-the-trainer basis?</p> | |
| Confidential (SIP) | Confidential | Being SIP registered allows us to pull the main fuse and/or install and isolator, allowing us to install renewable technologies, however when the customer has a 60 amp fuse and the maximum demand exceeds this, being unable to upgrade the main fuse to 80 amps causes big delays in the customer journey whilst we apply to DNO for a fuse upgrade and await a date for the work to be completed. | |
| | | | |
| | | | |
| | | | |
| | | | |

ENA Fuse Upgrade Project

COLLATED RFI RESPONSES WITH STANDING ISSUES GROUP COMMENTS

| Company | Confidential/ Anonymous | 3. Do you see appetite within your organisation to take this work forward considering the proposed scope? | Working Group Comments |
|--|----------------------------|--|------------------------|
| EDF | Non-confidential | <p>No significant appetite at present.</p> <p>We believe the case for supplier involvement has not been demonstrated, particularly where it would involve taking on DNO responsibilities and costs for minimal operational gain.</p> <p>We would, however, remain open to limited participation in trials or discussions focused on safety related fuse downgrades under defined conditions.</p> | No |
| Confidential | Confidential | Yes | Yes |
| Haste Ltd | Non-Confidential | At this stage we have an appetite to consider this proposed scope further, (the safety of the customer will need to be the priority). | Yes |
| Confidential (MEM with SIP approval) | Confidential | Yes. We see this as an achievable transition from our current scope of works. | Yes |
| British Gas | Non-Confidential | The main restriction for our business at present is the asbestos policy in place does not allow the removal of cartridge fuses from cut-out fuse carriers; so a fuse upgrade would conflict current policy and this initiative could not be implemented without a full internal HSE review. | Yes |
| Confidential (SIP) | Confidential | I foresee an appetite for us to carry out this work as it means we are able to provide a comprehensive service for our customers, allowing us to install | Yes |

ENA Fuse Upgrade Project

COLLATED RFI RESPONSES WITH STANDING ISSUES GROUP COMMENTS

| | | | |
|--|--|---|--|
| | | renewable technologies in a timely manner and causing as little inconvenience as possible and helping the UK meet the 2030 targets. | |
| | | | |
| | | | |
| | | | |

| Company | Confidential/ Anonymous | 4. To support improvements in the customer journey, we propose that the costs associated to the purchase of the impedance loop testing, the cost for metering tails (supply and install) and the cost for purchasing the fuse are covered by your organisation. Would you be willing to proceed on that basis? | Working Group Comments |
|---------------------|----------------------------|---|------------------------|
| EDF | Non-confidential | <p>Not under the current proposal.</p> <p>The expectation that suppliers fund loop testers, fuses, and training, for a task already performed by DNOs, is not commercially or operationally justified.</p> <p>Any cost transfer would need to be supported by clear industry wide efficiencies and evidence of measurable benefit to our customers.</p> | No |
| Confidential | Confidential | Yes | Yes |

ENA Fuse Upgrade Project

COLLATED RFI RESPONSES WITH STANDING ISSUES GROUP COMMENTS

| | | | |
|--|-------------------------|--|-----|
| Haste Ltd | Non-Confidential | Haste current purchase Earth Loop Impedance Tester that meets DNO specifications, Tails, Fuse's, supply and install costs are normally charged to the Customer and or in Hastes case for fuse upgrades to the DNO. | |
| Confidential (MEM with SIP approval) | Confidential | Yes. The equipment required is already stocked in our warehouse. | Yes |
| British Gas | Non-Confidential | This would not affect our business as use of an ELI tester is a standard test carried out on all New Build sites so could be extended to accommodate any new task introduced. The benefit of an LCT install without delay would negate the minimal costs of a fuse and also cabling replacement when required. | Yes |
| Confidential (SIP) | Confidential | We currently cover the cost for all of the above items bar mains fuses, which we will be able to add to our managed services system for all electricians to carry and be able to order. | Yes |
| | | | |
| | | | |
| | | | |
| | | | |

| | | | |
|---------|----------------------------|------------------------|------------------------|
| Company | Confidential/ Anonymous | 5. Any other comments? | Working Group Comments |
|---------|----------------------------|------------------------|------------------------|

ENA Fuse Upgrade Project

COLLATED RFI RESPONSES WITH STANDING ISSUES GROUP COMMENTS

| | | | |
|---------------------|-------------------------|---|--|
| EDF | Non-confidential | <p>We see value in considering fuse downgrades in specific circumstances, for example, where service or submain cables are undersized and cannot safely support existing fuse ratings, and replacement is impractical due to board access or cable length.</p> <p>This activity aligns with safety and compliance obligations but should remain separate from the proposed fuse upgrade scope.</p> <p>More broadly, we believe DNOs should retain responsibility for upgrades to their own assets, with suppliers focusing on metering and safety assurance functions.</p> <p>We also note that allowing suppliers to carry out fuse upgrades could create a potential commercial advantage for those supporting or promoting specific product installations (e.g. EV chargers or heat pumps).</p> <p>It is unclear how this risk would be managed or audited, and we would welcome further clarity on how any such advantage would be avoided.</p> | |
| Confidential | Confidential | N/A | |
| Haste Ltd | Non-Confidential | <p>Upgrading DNO fuses has always been the responsibilities of the DNO as the Cut Out and network supply cables are the DNO's responsibility, if fuse are upgraded were the DNO network cables are inadequate to take increased load the upgrade fuse will not protect the network cable, if fuses are upgraded were other apparatuses specification is not taken into account and or issues highlighted to the customer etc there could be major safety issues including the potential of a fire, therefore Operative competence via a EUSR module is unlikely to be enough – records of upgrades will need to be detailed, and company's involved in using Operative with these modules</p> | |

ENA Fuse Upgrade Project

COLLATED RFI RESPONSES WITH STANDING ISSUES GROUP COMMENTS

| | | | |
|---|------------------|--|--|
| | | as a competency (who have not been assessed by the DNO?) will need to be obligated to keeping records which will need to be subject to audit. | |
| Confidential (MEM with SIP approval) | Confidential | No comment. | |
| British Gas | Non-Confidential | Not at this time. | |
| Confidential (SIP) | Confidential | I personally believe having more renewable installer companies registered as SIP's and partaking in projects such as this will be integral for DNO's to keep broader and accurate records of equipment condition and keeps an open channel of communication which can help both sides of the industry in the upcoming challenges of increased renewable installations and grip improvements/ upgrades. | |
| | | | |
| | | | |
| | | | |
| | | | |