

## DIF 72 'Meter Moves'

### COLLATED RFI RESPONSES

#### RFI Questions

Please provide feedback to the following questions:

1. **To Distributors** – would it be acceptable to you for a Safe Isolation Provider to install tails from the fused protection to your cutout?
  - a. If so, what considerations would a DCUSA Working Group need to have in developing a solution?
  - b. If not, please provide your reasoning.
2. **To Suppliers** – would it be acceptable to you for your appointed MEM to connect the meter into the Red Link isolator instead of the distributor's cutout?
  - a. If so, what considerations would a DCUSA Working Group need to have in developing a solution?
  - b. If not, please provide your reasoning.
3. **To Safe Isolation Providers** – do you believe this potential expansion of Safe Isolation Works would be appropriate for you to undertake?
  - a. If so, what considerations would a DCUSA Working Group need to have in developing a solution?
  - b. If not, please provide your reasoning.

Company	Confidential/ Anonymous	Response	Working Group Comments
Watkins Electrical (SIP)	Non- confidential	Yes, I think it is a good idea giving this to the SIP as these works would fall within that scope.	
Aira Home (SIP)	Non- confidential	<p>I believe that the proposed expansions to the SIP scope would be a positive move as this would allow more issues identified on site to be rectified by SIP providers, reducing the strain on DNO resources and enabling better customer service, whilst removing a big blocker on the installation of renewable technologies.</p> <p>I would propose the following considerations:</p>	

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		<ul style="list-style-type: none"> <li>• Creating a more streamlined approach to electrical companies becoming registered SIPs, this will allow more companies to complete SIP works instead of completing works with no accreditation.</li> <li>• Clear communication of the SIP role to DNO's, as I still have some DNO's refuse to allow works to be carried out or questions why as a SIP, we are pulling the main fuse.</li> </ul>	
Voltari Serivces (SIP)	Non-confidential	<p>As a SIP provider this would be beneficial and deliverable under our current competencies of our workforce.</p> <p>Here are some consideration points:</p> <ul style="list-style-type: none"> <li>• Competence &amp; Authorisation Requirements - Clarification on whether SIPs need to meet equivalent standards to MOAs, or a tailored set for the new requirements? What impact will this have on R0270 and I0270 at REC?</li> <li>• Record Keeping, logging and auditability - what evidence and record keeping would be acceptable for the new activities?</li> <li>• Notification Requirements (Market Messages) - would different or amended market messages need to be sent to indicate the work completed at site?</li> <li>• Notification Requirements (DNO) - would there be any notification requirements to the DNO?</li> </ul>	
Northern Powergrid (DNO)	Non-confidential	<p>The scope of works for a SIP was limited by design when the party was created in DCUSA. It was not for this scenario in the RFI. Therefore, we do not think it appropriate to widen the scope of works for a SIP for this purpose.</p>	

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SSEN (DNO)	Non-confidential	<p>This request asks for SSEN's viewpoint on work that is currently outside the scope of Safe Isolation Providers (SIPs) in relation to the moving of a customers electricity meter to a position further than 3m from the distributor's cutout.</p> <p>Where the customer's First Point of Isolation (switchgear / switch fuse) is within 3m of the SSEN cut-out (in line with current SSEN policy), alterations of this nature fall under the responsibility of the supplier. As such, the connection, reconnection, or disconnection of the supplier's meter tails on the top side of the SSEN cut-out is not within SSEN's authority, and this activity does not currently fall within the remit of a Safe Isolation Provider (SIP).</p> <p>SSEN does not support a change to the scope of the SIP, as the role and responsibilities were deliberately designed with a narrow focus to limit the extent of work undertaken on or adjacent to Distributor equipment. Any proposal to broaden the SIP role to include the installation of tails from the cut-out to fused protection would represent a fundamental change and, in principle, it would be for suppliers to make the case for such a change and seek appropriate authorisation.</p> <p>Notwithstanding the above, if a DCUSA Working Group were to consider such a change, several important considerations would need to be addressed. These would include, but not be limited to, adequate training and competency requirements, a clear and unambiguous definition of the expanded scope of work, the use of agreed standard cable(s), containment and equipment, and the establishment of robust governance and assurance arrangements. Additional considerations would include the correct designation, demarcation, and identification</p>	
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		of SSEN-owned supply-side equipment (the cut-out) as distinct from supplier and customer equipment, in order to avoid any subsequent issues relating to maintenance, repair, replacement, ownership, and responsibility. Engagement with the IET in relation to the requirements of BS 7671 would also need to be considered.	
UK Power Distribution (DNO)	Non-confidential	<p>Had a look and it could be acceptable in principle, subject to clearly defined controls, competencies, and accountabilities.</p> <ul style="list-style-type: none"> <li>• Clear rules on what SIPs are allowed to do.</li> <li>• Appropriate training, authorisation and competency requirements for SIPs</li> <li>• Distributor notifications – Distributors must be notified in advance and/or after the work is completed so they are aware the work has taken place.</li> <li>• Clear ownership and accountability for the tails once installed</li> <li>• Agreed technical standards and materials</li> </ul>	
UK Power Networks (DNO)	Non-confidential	<ol style="list-style-type: none"> <li>1. Currently, UK Power Networks only permits cut-out access to 'controlled parties' (i.e. the supplier appointed meter operator, UK Power Networks staff, UK Power Networks representatives, and ICPs). All of which are considered to have 'appropriate authorisation' and competence to access/work on our service equipment safely. If the SIP is working for (or on behalf of) the supplier, I would suggest that SIP access to the cut-out is acceptable. However, I don't believe that we should be allowing an independent SIP (appointed by the customer/electrician) to access our cut-out - refer to item 3.</li> <li>2. As suggested above, the only current scenario that I would deem acceptable is if the SIP is working for (or on behalf of) the supplier. In which case, responsibility for the works is</li> </ol>	

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		<p>ultimately the suppliers and I would expect the SIP to be working to the suppliers policies &amp; procedures - additional control measures would need to be determined by the supplier.</p> <p>3. There would be significantly less control and accountability for the works undertaken by an independent SIP appointed by the customer/electrician. For example, how would we ensure that the independent SIP has (and maintains) the appropriate authorisations and competencies? Who would ultimately be responsible if the SIPs work was to fail/fault in future?</p>	
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