

Jonathan Blagrove  
Senior Manager - Consumer Policy and Insight  
Ofgem,  
9 Millbank,  
London,  
SW1P 3GE



**Consultation on the Smart Metering Installation Code of Practice – Electrical Safety  
Council Response**

Dear Mr. Blagrove,

The Electrical Safety Council (ESC) is a UK charity dedicated to reducing fires, deaths and injuries from electrical accidents, both at home and in the workplace.

With the electrical installation of almost every dwelling in the UK set to be affected, the Smart Meter program is of great interest to the ESC. We are delighted to have the opportunity to respond to this consultation exercise and hope that our comments are of use in the development of the Smart Metering Installation Code of Practice.

**Checklist**

Previous versions of the Code included a recommendation for providing the customer with an electrical safety checklist, filled out and explained by the installer after job completion. This checklist was intended to help inform the customer regarding possible safety issues identified during the smart meter installation and suggest the appropriate remedial action, as deemed necessary. Unfortunately this recommendation is no longer included, as shown in the extract from the code of practice, below:

3.3.14. Where appropriate, the Installer gives the Customer guidance on electrical safety, for example not storing objects too close to the meter;

The same section from the earlier revision 35:

3.3.14. Where appropriate, the Installer gives the Customer verbal guidance on safety and makes them aware of the risks of storing objects too close to or obstructing the meter, and a printed copy of The Electrical Safety Council approved checklist is to be left with the Customer;

We understand a reason for the change may be that MOCOPA has been amended, requiring installers to visually inspect the electrical installation at the intake position and inform the

customer accordingly (using a checklist supplied in appendix 12 of version 3.3 of MOCOPA). However, we still believe the checklist should be referenced in the Smart Metering Installation Code of Practice.

A requirement for providing general safety advice to the customer should also be considered. This could cover advice on the aforementioned issue of storing items close to the meter, as well as general advice on gas and electrical safety matters. Such a requirement has the potential to prevent unnecessary and otherwise avoidable fires and injuries by raising awareness of the need to treat their installation with the necessary considered care, as well as alerting them to safety issues that may otherwise go unnoticed.

**Question 1: What are your views on the smart metering-specific accreditation and training requirements that should be set out in the SMICOP?**

Relevant passages of the code of practice:

**2.2. Relevant Accreditation**

- 2.2.1. National Skills Academy for Power
- 2.2.2. Registration with Gas Safe Register (for the appropriate meter work categories)
- 2.2.3. QCF and ACS Gas Qualifications
- 2.2.4. Energy Efficiency Schemes – City & Guilds / NVQs
- 2.2.5. Meter Asset Manager’s Code of Practice (MAMCoP) – Gas
- 2.2.6. ESTA Automated Meter Reading Service Providers Code of Practice (ASPCoP)
- 2.2.7. IGEM Standards

**2.5. Recruitment**

As an intrinsic part of the recruitment process, it is each Member’s responsibility to ensure that;

- 2.5.1. Only suitable individuals are engaged as Installers;
- 2.5.2. Qualifications and experience are validated;
- 2.5.3. Suitable registration is verified with the Gas Safe Register in terms of work on gas meters;
- 2.5.4. All reasonable endeavours are taken to obtain information about the individual’s previous relevant employment;

2.5.5. Due regard is given to the appropriateness of the individual to the role of Installer, a Criminal Records Bureau check is carried out for all new Installers recruited, and the results of the Criminal Records Bureau check are appropriately factored in to the recruitment decision; and

2.5.6. When an Installer leaves their employment, Members must ensure IDs and any other branded materials related to the role are returned to the Member, and if appropriate, duly destroyed.

We note that, whilst there is a requirement for registration with the Gas Safe Register for work on gas meters, no specific mention is made of similar registration with a domestic electrical industry competent person's scheme or industrial equivalent for work on smart electricity meters in the list of 'Relevant Accreditation' in clause 2.2. This is clearly a discrepancy, as the risks associated with electrical installations are no less serious than those posed by gas. Whilst we acknowledge that electricity meters are not generally part of a consumer's electrical installation, we believe including a reference to those schemes would have a beneficial effect.

Such schemes ensure that responsible and competent electricians are recognised, and their inclusion would offer a guarantee that all electrically related work is done to the highest standard. Such industry professionals would also be more effective at identifying any problems with the consumer's associated electrical installation, such as an inadequate earthing arrangement.

The regulatory framework for meter installation, implemented by NSAP, does not as yet require installers to check the effectiveness of the earthing arrangement. Inclusion of a requirement to this effect would do much to increase electrical safety in many homes by ensuring that unsafe arrangements are identified and rectified before they present a hazard to the occupiers.

Should you require any more information or clarification regarding our comments on any of the above matters, please do not hesitate to contact me at [Martyn.Allen@esc.org.uk](mailto:Martyn.Allen@esc.org.uk), or by telephone on 02034 635 114, I would welcome an opportunity to discuss the consultation further and in greater detail.

Yours sincerely,

Martyn Allen, Head of Technical Development