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| Modification proposal: | **Distribution Connection and Use of System Agreement (DCUSA) DCP253 – Retightening and Remaking of Whole Current Metering System Terminal Connections** | | |
| Decision: | The Authority[1] directs this modification[2] be made[3] | | |
| Target audience: | DCUSA Panel, Parties to the DCUSA and other interested parties | | |
| Date of publication: | 12 August 2016 | Implementation date: | Next DCUSA Release following Authority Consent[4] |

## Background

The Distribution Connection and Use of System Agreement (DCUSA) is a multi-party contract between electricity distributors, suppliers and generators containing provisions regarding connection to, and use of, electricity distribution systems in Great Britain.

At present, a Distribution Network Operator (DNO) is permitted to work only on its assets within a customer's premises. This extends to the cut-out fuse but not to the metering system. DNOs have a requirement to make safe and leave an installation in a condition that is fit for service. A situation may arise where a DNO has identified an unsafe situation with the metering equipment (eg a slack meter tail) which it could make safe but cannot currently do so because it is not permitted to interfere with the metering system. As a result, unless the Meter Operator (MoP) appointed by the Supplier can attend in a timely fashion, the DNO will have no choice but to de-energise the property. This is particularly problematic if the customer is on the Priority Services Register (PSR).[5]

DCUSA Issue Form (DIF) 041[6] highlighted (following a court case[7]) the elevated risk in relation to the DNO replacement of the service cut out where, despite best endeavours, the meter terminals are disturbed. This led to a concern over liability due to acts or omissions which might lead to an increased fire risk at the service termination/metering position. A Request For Information (RFI) issued in October 2014 asked DCUSA Parties to provide their views on four solutions to this concern. All respondents preferred the option described in the modification proposal.

## The modification proposal

DCP253 (the modification proposal) was raised by UK Power Networks in November 2015. The modification proposes to allow a DNO to retighten the meter tails and customer tails connecting into and out of a whole current meter, or to remake connections to the meter terminals as necessary, prior to re-energisation when a DNO replaces its service cut-out fuse.

[1] References to the "Authority", "Ofgem", "we" and "our" are used interchangeably in this document. The Authority refers to GEMA, the Gas and Electricity Markets Authority. The Office of Gas and Electricity Markets (Ofgem) supports GEMA in its day to day work. This decision is made by or on behalf of GEMA.
[2] 'Change' and 'modification' are used interchangeably in this document.
[3] This document is notice of the reasons for this decision as required by section 49A of the Electricity Act 1989.
[4] The next DCUSA release is scheduled for 1 September 2016.
[5] Electricity suppliers to domestic premises are required under standard condition 26 of the Electricity Supply Licence to establish and maintain a Priority Services Register which lists all of the licensee's Domestic Customers who are of Pensionable Age, disabled or chronically sick and have asked to be added to the PSR.
[6] Information on DIF 041 is available on the DCUSA website here: https://www.dcusa.co.uk/Lists/Issue%20Register%20List/DispForm.aspx?ID=44&Source=https%3A%2F%2Fwww%2Edcusa%2Eco%2Euk%2FSitePages%2FActivities%2FIssues%2DRegister%2Easpx&ContentTypeId=0x0100F8F1270899782F40A33FFD618BAD729C
[7] The High Court decision dated 17th September 2012 on Case Nos: HT-10-95, HT-10-210, HT-10-427 and HT-11-163 in respect of "Repair, Installation, Maintenance and Inspection of Supply Side Equipment", Neutral Citation Number: [2012] EWHC 2541 (TCC).

The DCUSA working group established to assess the modification proposal considered that it better facilitates two of the DCUSA General Objectives: 3.1.1[8] and 3.1.3.[9]

- General Objective 3.1.1 – the working group considered that the proposal enables a simpler, faster and safer procedure to ensure the integrity of the electrical equipment on the customer's premises. The working group also considered that it better ensures the safety of the relevant customer than would be the case with either no tightening of meter terminals or alternative solutions, leading to complex communication and delays between DNO works and Supplier retightening of meter terminals.

- General Objective 3.1.3 – the working group considered that the ability of the DNO to retighten and, if necessary, remake connections to the metering system terminals following DNO works upon its service equipment will enable the DNO to operate more safely when conducting its duties under the Electricity Act, the Electricity Safety, Quality and Continuity Regulations (ESQCR) and Electricity at Work Regulations. With the DNO otherwise constrained from working upon the metering system terminals, the working group considered that Suppliers and DNO Parties are at elevated risk from untightened meter terminals following DNO works.

**DCUSA Parties' recommendation**

The Change Declaration for DCP253 indicates that all DCUSA parties were eligible to vote on DCP253. In each eligible party category where votes were cast, there was unanimous support for the proposal and for its proposed implementation date. In accordance with the weighted vote procedure, the recommendation to the Authority is that DCP253 is accepted. The outcome of the weighted vote is set out in the table below:

| **DCP253** | WEIGHTED VOTING (%) | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | DNO[10] | | IDNO/OTSO[11] | | SUPPLIER | | DG | | Gas Supplier | |
| | Accept | Reject | Accept | Reject | Accept | Reject | Accept | Reject | Accept | Reject |
| CHANGE SOLUTION | 100% | 0% | 100% | 0% | 100% | 0% | n/a | n/a | n/a | n/a |
| IMPLEMENTATION DATE | 100% | 0% | 100% | 0% | 100% | 0% | n/a | n/a | n/a | n/a |

**Our decision**

We have considered the issues raised by the proposal, the Change Declaration dated 19 July 2016 and the Change Report. We have considered and taken into account the vote of the DCUSA Parties on the proposal which is included in the Change Declaration. We have concluded that:

- implementation of the modification proposal will better facilitate the achievement of the DCUSA General Objectives;[12] and

- directing that the modification is approved is consistent with our principal objective and statutory duties.[13]

[8] The development, maintenance and operation by each of the DNO Parties and IDNO Parties of an efficient, co-ordinated, and economical Distribution System.
[9] The efficient discharge by each of the DNO Parties and IDNO Parties of the obligations imposed upon them by their Distribution Licences.
[10] Distribution Network Operator
[11] Independent Distribution Network Operator/Offshore Transmission System Operator
[12] The DCUSA General Objectives (Applicable DCUSA Objectives) are set out in Standard Licence Condition 22.2 of the Electricity Distribution Licence and are also set out in Clause 3.1 of the DCUSA.
[13] The Authority's statutory duties are wider than matters that the DCUSA Parties must take into consideration and are detailed mainly in the Electricity Act 1989 as amended.

**Reasons for our decision**

We consider this modification proposal will better facilitate DCUSA General Objectives 3.1.1 and 3.1.3 and has a neutral impact on the other applicable objectives.

***DCUSA General Objective 3.1.1 'the development, maintenance and operation by each of the DNO Parties and IDNO Parties of an efficient, co-ordinated, and economical Distribution System'***

The proposal seeks to address the risk that a DNO is unable to rectify a potentially dangerous situation with equipment that is outwith its control, ie the metering equipment, when it has replaced its cut-out fuse. In these situations, where slack meter tails are identified on the metering equipment, the DNO currently has to wait until a MoP attends the site to tighten the tail screws. This can cause significant cost in time or can result in the DNO having to make the installation safe through de-energisation. We note that this is particularly problematic when the customer is on the PSR.

DNOs have competent staff that can tighten tail screws on metering equipment and any liabilities are covered under the Meter Operator Code of Practice Agreement (MOCOPA). As a result, the DNO can carry out this work in a quick and timely fashion without additional cost or inconvenience to the customer.

We consider that enabling the DNO to work on this aspect of the metering equipment will improve its ability to maintain an efficient, co-ordinated and economic distribution system. This is achieved by reducing unnecessary call out of MoP staff to remedy a situation that a DNO operative could attend to easily and quickly.

***DCUSA General Objective 3.1.3 'the efficient discharge by each of the DNO Parties and IDNO Parties of the obligations imposed upon them by their Distribution Licences'***

The working group noted that DNOs do not have any obligations under their licences to operate upon metering equipment. However, they do have wider obligations related to safety matters under the Electricity Act, the ESQCR and the Electricity at Work Regulations. The DNO has an obligation to make safe and leave an installation in a condition that is fit for service. By allowing DNOs to carry out this minor action, the overall safety of the installation will be improved and allow the DNO to carry out its obligations with regards to the safety of the installation.

**Decision notice**

In accordance with standard licence condition 22.14 of the Electricity Distribution Licence, the Authority hereby directs that modification proposal DCP253 *'Retightening and Remaking of Whole Current Metering System Terminal Connections'* be made.

**Min Zhu**
**Associate Partner, Cost and Outputs and Technical**
Signed on behalf of the Authority and authorised for that purpose