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FAQs

R0021 – ALLOW A REC MEM TO DE-ENERGISE AND RE-ENERGISE ANY METERING POINT WITHOUT THE NEED TO BE INSTRUCTED BY A SUPPLIER

An Impact Assessment was carried out on the proposed solution options for this Change Proposal and a number of questions were asked in the responses. This document aims to help address some of those questions in advance of the REC Event planned for 5 July 2022.

WHAT IS A SAFE ISOLATOR PROVIDER (SIP)?

A SIP is someone who can provide safe isolation services to premise owners outside of the Supplier Hub arrangements.

HOW DO YOU BECOME A SIP?

A REC MEM must also accede to DCUSA and maintain their REC accreditation before they can work as a SIP (which includes accepting any contracts from Premise Owners to install isolators or facilitate the installation of Low & Zero Carbon technologies).

HOW WILL WE KNOW THAT A SIP HAS ACCEDED TO DCUSA?

DCUSA will inform the REC Code Manager via the REC Service Desk when DCUSA accession is complete. This information will then be added to the REC Party Register which is found on the REC Portal.

WHO CAN SIPS WORK FOR?

SIPs are contracted directly with Premise Owners – such as the Local Authorities, Social Housing Associations, Private Landlords, or individual owner occupiers.

WHAT CAN A SIP DO?

The role of the SIP is defined separately from that of the REC MEM, and they should not be conflated They have a very narrow scope of activities that they can undertake:

(a) De-energise that Metering Point.

(b) (if reasonably necessary) adjust the terminals of the meter and associated equipment and re-make the connection to them to make safe and remedy any disturbance of the connection that may have occurred.

(c) If required, terminate replacement customer tails into the Suppliers Meter, customer tails having been presented and tested by the electrical contractor as part of their works

(d) Re-energise that Metering Point.

RETAIL ENERGY CODE

WHAT CAN'T A SIP DO?

When the SIP attends the premises under a contract with the Premise Owner, they cannot perform any other metering related activity that would be reserved to the supplier and their MEM under their contractual relationship. For example, they cannot move or exchange a meter.

DOES THE SIP NEED THE CONSENT OF THE SUPPLIER BEFORE THEY CAN WORK ON THE SUPPLIER'S ASSET?

No, the SIP is authorised to work on the Supplier's equipment, to the extent permitted by the accession terms within DCUSA. The scope of the work is intentionally very narrow and is to provide a service to premise owners which is not typically provided by the Supplier to Landlords, since the Landlord is rarely the Supplier's customer. The expectation is that this will help reduce the instances where this work is done without the necessary authority.

DOES THE SIP NEED THE CONSENT OF THE DISTRIBUTOR BEFORE THEY CAN WORK ON THE DNO ASSET?

No, the SIP is authorised to work on the Distributor's equipment, to the extent permitted by the accession terms within DCUSA.

WHAT TYPE OF PROPERTIES AND METERS CAN A SIP WORK ON?

The solution only applies to Whole Current Meters. The proposed solution doesn't stipulate what type of property a SIP can work on; however, the SIP may not work on a meter for which they are not qualified under their REC MEM accreditation.

SHOULD THE MEM CARRY OUT RISK ASSESSMENTS?

Yes, Risk Assessments should be a normal feature of any work being performed by someone who is qualified as a REC MEM, and when on site as a SIP the same is expected.

Additionally, the SIP will require the Contracting Premise Owner to have conducted their own risk assessments and provide appropriate evidence before commencing work. This will include confirmation of consent by the tenant to the work being undertaken, and that the tenant's vulnerabilities have been considered (see below).

HOW WILL THE TENANT KNOW THIS WORK IS BEING DONE?

The Landlord will need to provide evidence to the SIP that they have given notice to the tenant, that the work is planned, and that they have gained the consent of the tenant for the work to be progressed.

WHAT IF THE TENANT HAS ALREADY ASKED THEIR SUPPLIER TO DO THE WORK?

The Premise Owner must give the tenant advance notice of the intention to carry out the work and obtain their consent. It is unlikely that a Local Authority or Social Housing Organisation tenant will have requested the same service - at the same time as their landlord. Given also that this is usually a chargeable service, and a landlord would usually expect to have to give permission for any work to be carried out at their premises, this is not expected to be a problem.

WHAT ABOUT VULNERABLE TENANTS?

Before a SIP can begin any work, the Landlords will have to provide evidence to the SIP that they have gathered relevant information from the tenants, specifically about any special needs that need to be provided for before their supply can be interrupted, for example:

- having electricity dependent medical equipment (such as stair lifts, bath hoists, home dialysis, etc) that will be impacted by the de-energisation of the metering point; or for homes where an additional person is needed to provide support to the occupier (age related, language related or other un-specified vulnerability), the Landlord should expect to give the tenant advance notice of when the work will be commenced to allow for the tenant to make suitable arrangements.

The Landlord will need to record the data and gain the tenant's consent to provide that to the SIP. The Landlord and the SIP should have regard to the Data Protection Principles.

WOULD THE SIP LEAVE A SITE DE-ENERGISED FOR AN ELECTRICIAN TO RESOLVE?

No, If the SIP de-energises the site they should re-energise it again at the conclusion of the work.

WHAT HAPPENS IF THE SUPPLY IS INTERRUPTED ALREADY?

If the SIP attends the Site and finds that the flow of electricity through the Metering Point has been interrupted (and remains interrupted) they may not carry out any work to re-energise the metering point.

WHAT WILL THE SIP DO IF THERE IS EVIDENCE OF INTERFERENCE WITH THE METER?

If the SIP finds either

- there has been interference with any electricity metering equipment that has prevented such metering equipment from correctly registering the quantity of electricity supplied; and/or
- the electricity metering equipment otherwise presents a danger.

Then the SIP should promptly notify the same to the Registered Supplier (or the UKRPA if the Supplier's identity is unknown).

The SIP should provide any evidence (such as photographs) to support the notification, if available/requested.

WHAT IF THE SIP FINDS EVIDENCE OF DANGER OR DAMAGE THAT REQUIRES THE ATTENTION OF THE DNO?

The Normal Category A and Category B notices that a MEM would usually send to the DNO should be sent by the SIP to the DNO, so that the DNO may take the appropriate steps.

WHAT IF AN EMERGENCY OFF-SUPPLY SITUATION OCCURS WHILE THE SIP IS ON-SITE?

The SIP's role is very specific and in his capacity of a SIP he cannot act outside of the remit of his permitted activities.

RETAIL ENERGY CODE

HOW WILL A SUPPLIER'S MEM KNOW THAT A SIP HAS CARRIED OUT WORK?

The SIP will use their own Sealing Pliers, which may be different to that of the Appointed MEM.

HOW WILL THE DNO KNOW THAT A SIP IS GOING TO CARRY OUT WORK?

The DNO's are investigating the possibility of providing a web portal for the SIP to upload planned works in advance of beginning work so that they can respond appropriately if they receive alerts regarding outages.

WHAT OBLIGATIONS OR EXPECTATIONS ARE ON THE SUPPLIER?

The supplier will receive Market Messages from the SIP regarding faults/damage found, potential interference, or the failure to re-initiate communications with smart metres. The Supplier will need to follow up on any notifications received. If the SIP cannot carry out the requested work by the Landlord until the Supplier has remedied issues for which they are responsible, the Supplier will have to notify the SIP that the fault/damage has been rectified.

HAS THERE BEEN ENGAGEMENT WITH THE UKRPA REGARDING PROVISION OF TIP OFFS FROM THE SIP?

Yes, the UKRPA has confirmed that they will accept the reports and pass them to the relevant supplier.

HOW WILL A SIP IDENTIFY THE SUPPLIER OR THE APPOINTED MEM?

The MEM already has access to EES at a Portfolio level. We are proposing that the SIP be given a wider, but limited access to EES to view the MPAN, the Metering Point Address, and the identity of the Registered Supplier and their Appointed MEM, for the purposes of sending the necessary Market Messages.

HOW WILL THE SIP KNOW IF THE NETWORK OPERATOR IS AN IDNO?

The IDNO Distributor ID in the MPAN Number will fall in the range between 24 and 38, whereas the geographical based DNO IDs ranges between 10 and 23.

SHOULD TAMPER FLAGS BE IGNORED FOR SMART METERS WHEN THE SIP IS WORKING?

That is a decision for the Supplier to make and is not within the scope of this proposal. We are looking for a simple solution that would allow the SIP to notify the Supplier that they have attended site. This will be for information purposes only and will not require any action to be taken on receipt of the notice.

WHAT PROVISIONS WILL BE IN PLACE FOR THE SIP TO TEST THE METER TO ENSURE IT IS WORKING CORRECTLY?

The SIP is a qualified MEM and will ensure that when the site is re-energised, it is left in working correctly.

IF A SIP CAUSES DAMAGE, HOW WILL THIRD PARTY CLAIMS BE MANAGED?

The DCUSA legal text covers indemnities for the Supplier and the DNO for third party claims arising from work undertaken by the SIP.

The SIP and the Premise Owner will have commercial agreements that cover their responsibilities. Tenants should first contact their Landlord in respect of any claim for damages.

IF THE SIP IS TIGHTENING METER TAILS, HOW DO WE ENSURE THE COMPETENCY OF THE SIP?

The SIP is a qualified MEM who is subject to assurance and audit that applies to all MEMs.

IF THE SIP MAKES AN ERROR, WOULD IT BE ANOTHER SIP THAT REMEDIES THOSE ERRORS?

The SIP is a qualified MEM, and the scope of work the sip can undertake are purposefully narrow so as not to cross over into the supplier's responsibilities. The SIP will be in a contract with the Premise Owner and resolution of any errors with their work will rest between the contracting parties.

HOW WILL PARTIES COMMUNICATE WITH SUPPLIERS AND THE DNO?

In the Impact Assessment we conducted, we proposed two solutions, one based on Market Messages and one using the SDEP. Overwhelmingly, parties preferred the use of Market Messages and therefore we will not take forward development of any communications using SDEP.

WHO IS THE RESPONSIBLE PARTY TO SET THE RE-ENERGISATION STATUS IF WORK COMPLETION TAKES LONGER THAN 1 DAY?

If the site is to remain de-energised for more than 1 day, the SIP will need to advise the Supplier of the change in energisation status. Once the site is re-energised, the SIP will need to send the appropriate communication regarding the re-energisation status to the supplier

HOW DOES A SIP KNOW THE PERSON REQUESTING THE WORK IS THE PREMISE OWNER?

The SIP will ask the Contracting Party for assurance that they are the Premise Owner and authorised to ask for the work to be undertaken.

WILLTHE SIP ACTIVITIES CAUSE SUPPLIERS MORE METERING WORK?

There are a large number of Isolations being performed illegally now that are not being performed by the Supplier or the DNO which cause issues for the Supplier and there is no visibility, traceability or action the supplier can take if there are problems.

Local Authorities and Housing Associations and other private landlords need a legitimate solution, provided by competent qualified meter workers, because they have been unable to obtain an isolation service from their tenant's supplier at an individual premise level, and there are no solutions that work effectively for refurbishment projects which don't involve trying to co-ordinate multiple suppliers and the Supplier's MEMs. This solution should not make the situation worse and should give Suppliers the reassurance that the work is being carried out by appropriate qualified parties, subject to the same assurance as their own MEMs .

WHAT HAPPENS IF THE SIP CANNOT RE-ESTABLISH THE COMMUNICATIONS WITH A SMART METER?

The SIP should make all reasonable efforts to re-connect the communications on re-energising the Metering Point. If the SIP is unable to do so, they should send notification to the Supplier for them to action the reconnection and advise the tenant that they have done so. The Supplier will then resolve with their customer.

WILL THERE BE REPORTING TO MONITOR THE PERFORMANCE OF THE SIP AND DNO MESSAGE PERFORMANCE?

We have asked the Performance Assurance for more information on this issue and an update will be provided in the Preliminary Change Report to be published shortly.

WHO IS THE RESPONSIBLE PARTY TO SET THE RE-ENERGISATION STATUS IF THE WORK COMPLETION TAKES LONGER THAN THE SAME DAY?

The SIP would not expect to de-energise a site that cannot be re-energised with the same day, except in unforeseen circumstances. The SIP would be responsible for re-energising the site they have de-energised.

WHAT OTHER PROCESSES ARE TRIGGED SUBSEQUENT TO RE-ENERGISATION OVER 1 DAY – E.G., REQUIREMENT FOR D00010 FOLLOWING CHANGE OF ENERGISATION STATUS.

No other activities are expected.

WILL THE SIP BE TRAINED TO IDENTIFY IF THE METER WON'T CONNECT – IF CLASSIC AND COMMS, AND SET UP CORRECT IN SMART METER?

SIPs are first and foremost Meter Equipment Managers who have the appropriate qualifications, skills and experience necessary to operate as a MEM.

A DCUSA CP 383 Guidance note prepared for circumstances when the DNO might move a supplier's meter could be usefully applied here too. It offers guidance on what should be checked to confirm the customer's meter connectivity. On the smart meter communications hub there are five connectivity indicators (SW, WAN, MESH, HAN, GAS). The SIP should check which of these are in use prior to de-energising the meter and check that they are all returned to the same state when re-energising. Any differences identified will be notified to the Supplier on completion of the works if the Communications cannot be re-established. (A photograph may prove useful to confirm the pre and post status) .

WILL THE SIP FUND THE RE-CONNECTION COST IF THE METER DOESN'T RECONNECT COMMUNICATIONS?

No, because we have kept the scope of the works the SIP can carry out as very narrow (so as not to interfere with the Supplier's/MEM's responsibilities) the actions the SIP can take are also necessarily limited, and therefore they cannot mitigate this risk.

Communications fail as a business-as-usual activity – whether for planned or unplanned reasons, and where this happens after a de-energisation and re-energisation, in many cases the Supplier will be able to re-establish communications remotely.

If it becomes clear (supported by evidence) that site visits are regularly necessary following a SIP's work, then the question can be revisited.

WHO PICKS UP THE EARLY REPLACEMENT CHARGES IF THE METER IS "BRICKED" AS A CONSEQUENCE OF THE SIP'S WORK?

This would be an extremely unlikely outcome because of de-energising and re-energising the supply to allow the installation of isolators or L&ZCT equipment and should be no different to an off-supply event where the meter re-establishes communication after a power outage. However, if the Supplier has evidence that the SIP has in some way caused the meter to become redundant, they would address this via a third party claim for damage.

HOW ARE SUPPLIER'S SYSTEM AND PROCESS CHANGES BEING FUNDED?

The changes are expected to be relatively small, since we are proposing to use existing processes and messages, but to extend their use by the SIP.

Taking wider benefits into consideration,

- Suppliers will be able to focus their MEM resources on the roll out of Smart Meters and will not need to provide services to landlords directly, this is an obvious benefit to both consumers and suppliers.
- Local Authorities and Housing Associations report that they cannot adequately access this service through their tenant's supplier, and that there is no process to co-ordinate refurbishment projects that include these improvements across multiple suppliers and MEMs. This change removes the need for an additional solution for a wider programme approach to refurbishments or L&ZCT installation projects

We therefore consider it appropriate that suppliers meet their own costs.

ARE THE PROPOSED MMS BEING RETAINED AFTER IMPLEMENTATION OF MHHS?

We have asked for a view from the MHHS Programme and will provide an update in the Preliminary Change Report to be published shortly.

COULD A CLEAR VISUAL INDICATOR ONSITE OF WHO FITTED THE ISOLATOR – E.G., A LUGGAGE TAG SIMILAR TO THE ONE USED FOR METER INSTALLATIONS?

We think this is a sensible request, Consultation Question. Should there be a flow for notification of SIP attendance, for consultation – Supplier only or Supplier and Supplier's MEM?

ADDITIONAL QUESTIONS RAISED WHICH ARE OUTSIDE THE SCOPE OF R0021

COULD SIPS BE REQUIRED TO BE ISO9001 ACCREDITED AS THEY'RE ALSO WORKING IN OUR CUSTOMER PROPERTIES?

SHOULD THERE BE OBLIGATIONS ON SERIALISED COMPONENTS AND THE ABILITY TO TRACK EACH ONE SHOULD THERE BE A NEED FOR AN ISOLATOR RECALL AGAIN?

These are wider issues that the proposed changes for R0021. We do not propose to deal with these issues in this Change Proposal.