RETAIL ENERGY CODE

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I0278 – ESTABLISHING THE SAFE ISOLATION PROVIDER (SIP) AS A STANDALONE REC PARTY

WORKING GROUP REPORT

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FOR INFORMATION

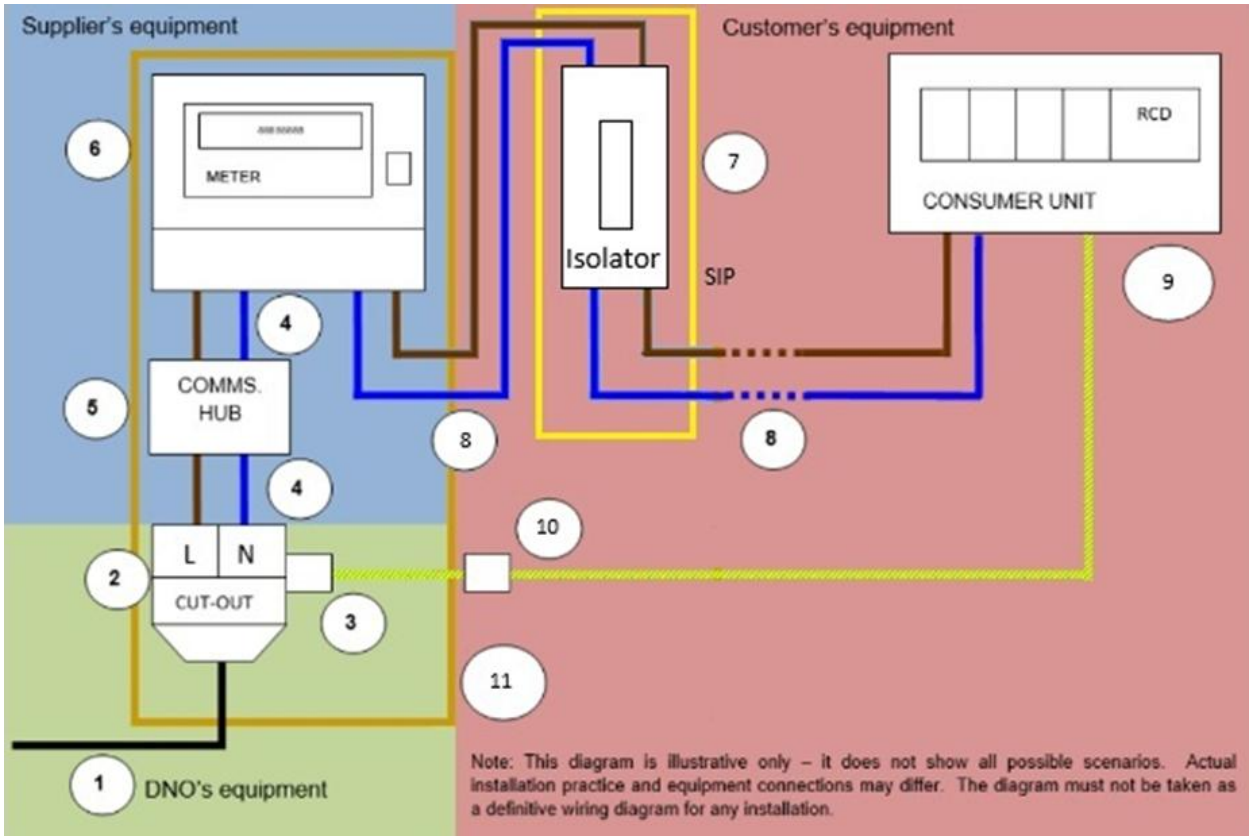
1 PURPOSE

The purpose of this paper is to provide industry Parties with a summary of points agreed on during the first and second working group sessions that took place on 5 May and 29 June 2026.

2 SCOPE AND FRAMEWORK FOR STANDALONE SIPS

During the working group sessions

1. Visual representation of SIPs' responsibilities



The current draft was shown to members who agreed it was a good starter for 10.

They agreed for the Code Manager to amend the diagram with some explanatory notes, and to expand the responsibilities of SIPs in different scenarios with some supporting documentation. The Code Manager will amend the diagram after responsibilities have been clearly defined and agreed and will share the new version to members.

2. Demarcation line

The WG agreed that:

- SIPs responsibilities should extend from the top of the cutout to the outgoing terminal of the meter, but not the meter itself.
- SIPs should not work on, move, or replace the meter or associated metering equipment.
- The permitted activities, exclusions and safety requirements should be made explicit through guidance, specific scenarios and examples.

3. Replacing meter tails

SIPs should be permitted to replace meter tails:

- Between the cut-out and the meter.
- Between the meter and the isolator.

This is appropriate where replacement is required for safety reasons.

The supporting documentation should clearly state that SIPs cannot move the meter or alter metering equipment.

4. Upgrading meter tails

The WG agreed that:

- SIPs should be permitted to replace tails where undersized or non-compliant tails are identified.
- SIPs must use the correct cable size appropriate to the installation capacity.
- SIPs should record when they upgrade meter tails.
- Cable sizing requirements should be clearly defined in governance arrangements.
- Correct sizing and identification of unsuitable tails should form part of SIP training.

The same technical standards currently applied to MEMs should apply to standalone SIPs.

- Where an installation contains separate restricted/off-peak and 24-hour supplies, they should be able to put an isolator on both the restricted side and on the 24-hour supply.
- Additional diagrams and guidance should cover alternative metering arrangements, including A5 terminal meters.

- Reporting arrangements are needed when communication or metering issues are identified.

5. Installing a safe isolator when there is not one in situ

There is currently no legal obligation to do so. Members agreed to explore this area further, by checking whether a legal precedent could be added into CoMCoP, or whether it could be encouraged as best practice. Any legal requirement would require new auditing which would add complexities for organisations.

6. De-energisation

SIPs should be able to de-energise provided that there are:

- A SIP-specific safety training
- Clear distinctions are maintained between SIP activities and qualified electrician activities.
- A guidance document that covers PV installations, batteries, EVs and other local generation technologies.
- Clear operational boundaries.

SIPs' activities should be limited to a whole current and this should be explicitly stated in the REC and supporting documentation. If a SIP encounters a CT-metered environment or a whole-current meter mounted on CT infrastructure, the job should be aborted. Specialist operatives should undertake that work instead. This boundary should be clearly reflected in governance and training.

7. Re-energisation

SIPs (as individual or organisation) can only re-energise supply they (or their organisation) would have de-energise as part of the same job. This should also be explicitly stated in the REC and supporting documentation, and in the training and handover process:

- SIPs should not fit an isolator and re-energise if the supply is off on arrival.
- They should abort their work, unless their own organisation would have previously de-energised this property.
- When re-energising a property, SIPs should only go to the first isolation point, and if they are unsure of the situation, they should install an isolation switch.

Future conversations are required to understand:

- How compliance with the de-energise and re-energise rules are monitored.
- Whether an escalation and notification process is needed where energisation status is found to be incorrect.

8. Fuse replacement

The WG agreed on several principles:

- Responsibility for fuse upgrades remains with DNOs.
- However, some flexibility should be added to avoid creating barriers and allow SIPs to be able to upgrade fuses.
- Any future permissions must be supported by appropriate training, standards and audit requirements.

Further discussion is needed once the ENA Engineering Recommendation (EREC) becomes available.

9. Damaged screws

The WG agreed that:

- SIPs may be able to continue work where damage already exists, provided the installation can be worked on safely.
- There should be a mechanism allowing SIPs to evidence existing damage before commencing work.
- This protects SIPs from being incorrectly held responsible for pre-existing defects.

10. Multi-way double pole blocks

The WG agreed that:

- There is no issue with SIPs encountering or working around multi-way double pole blocks provided they are:
    a. Fit for purpose.
    b. Not damaged.
    c. Safe for continued use.
- SIPs should assess whether such equipment is safe.
- If found unsafe or damaged, SIPs should have an obligation to make it safe or replace it where appropriate.
- Where multiple connections are involved, SIP responsibility should be limited to the installation they are working on.
- Any wider concerns should be notified to the Consumer via certification or reporting processes.

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11. Tightness checks on cutout terminals

The WG agreed that checking terminal tightness should form part of SIP training and assessment.

Training should cover:

- Correct tightening techniques.
- Risks associated with over-tightening.
- When torque tools are used, they should be calibrated and set to the required torque for the equipment being worked upon.
- Awareness of older and specialist cutout types and fuses: metal-clad cut-outs, rewireable fuses, J-type fuses, porcelain fuse carriers, asbestos-containing cut-outs, Shared neutral arrangements and looping configurations

Standalone SIPs should be aware of and have access to the Service Terminations Issue Reporting Guidance (STIRG) document and the Cut Out Glossary (this document is currently under review).

12. Shared services

The WG agreed that:

- Standalone SIP should normally act as the lead party where it is undertaking the work.
- Shared neutral and dropped-neutral risks remain a significant challenge.
- Re-energisation rules remain key.
- Supply-dependency and medical equipment should be identified during pre-work assessments.

13. Reporting, investigations and escalations

- A clear audit trail is needed showing who last worked on the installation.
- Work conducted by SIPs should be recorded and accessible for incident investigation purposes.
- SIP governance should include investigation procedures and reporting requirements.
- SIPs should have defined escalation routes for issues they identify.

14. Access and pre-work surveys

Although the WG acknowledged that some access issues cannot be resolved by I0278, members generally agreed that:

- Pre-work site surveys provide significant value.

- SIPs should be trained to identify access blockers before attending or commencing work.
- Training and governance should include checklists covering:
    a. Looped/shared supplies.
    b. Obstructed meters.
    c. Utility clashes.
    d. Consumer unit accessibility.
    e. Medical dependency considerations.
    f. Other factors affecting safe completion of work.
- It may not be possible to mandate surveys through I0278, but their benefits should be clearly reflected.

15. Use of isolators for complex metering arrangements

Members agreed that:

- For 5-terminal meter installations, SIPs should fit isolators for both services as a minimum.
- Configuration-specific scenarios must be covered through training and supporting documentation. However, new systems will be created. How they are communicated to the industry so they can be updated in the training, would need to be considered.
- Where SIPs encounter an unfamiliar installation or do not understand the configuration, they should stop work and seek advice rather than proceed.

16. Number of isolators required

The W\G agreed that:

- The number of isolators required, and the type of isolation solution will depend on the installation configuration (e.g. off-peak supplies, multi-rate meters, separate time switches).
- Guidance should remain flexible and not prescribe a fixed minimum number that could be unsuitable for certain installations.

17. Marking of cables

Members agreed that:

- Current CoMCoP requirements for cable marking should remain unchanged.
- Additional education and guidance are needed to improve consistency and understanding across operatives.

- Engagement with the Institution of Engineering and Technology (IET) may be beneficial to ensure alignment and understanding of requirements.

18. Smart communications and earthing arrangements

Members agreed that:

- Restoration of smart communications following works should be covered within SIP training.
- SIP training and documentation should include awareness of different earthing arrangements.

The WG also agreed that:

- Earth fault loop impedance testing should not form part of the SIP role.
- Responsibility remains with electricians during installation activities.
- SIPs should identify when it is safe to proceed. When it is not safe to proceed, SIPs should stop their work and seek advice.

Overall, members agreed that any Party who is the last on site and would identify something wrong would have a duty of care to rectify the situation if it is within their scope. If it is outside their scope, they would have to report it to the responsible organisation.

3 EQUIPMENT REQUIREMENTS

1. Minimum equipment requirements

Members agreed that:

- SIPs should meet the same minimum equipment and PPE requirements as EMOs.
- This should include appropriate arc-flash protection, gloves, visor, flame-resistant clothing and other approved safety equipment because SIPs undertake equivalent electrical activities.
- It might be worth aligning CoMCoP to the DNOs' standard list.

2. Evidence to demonstrate equipment suitability

The WG agreed that:

- SIPs should follow the **same protocols as** EMOs to demonstrate equipment fitness for purpose.
- Evidence should include certification, calibration records, maintenance records, conformity declarations and equipment audits

3. Expected testing activities before, during and after isolation

The WG agreed that:

- The SIP documentation should provide specific scenarios to cover eventualities and anomalies.

4. Standardised test procedures

Members agreed that:

- SIPs should follow the same standardised testing procedures as EMOs.
- These include activities such as polarity checks, voltage indication, proving dead/proving live tests, phase rotation checks and other standard metering safety tests.

Members also agreed that:

- Training should clearly specify what tests are required – whether it is voltmeter, a probe or cycling test lamps – and how they should be performed.
- There should be no relaxation of current safety testing requirements prior to fuse removal.
- The procedure before removing fuses should include touch voltage of exposed extraneous productive parts, diverted currents, leakage currents, understanding full requirements, and GS 38 voltage indicators.

5. Evidence needed from each isolation visit

Members agreed that a standard set of information should be captured:

- Date and time of visit.
- Property address.
- MPAN.
- Possibly the operative who conducted the work.

Other points were discussed:

- Seal identification, although further discussion is required on the sealing methodology before this can be agreed upon.
- Photographic evidence. Although many recognised its benefits for investigations, compliance and operative protection, a few concerns were raised such as:
    a. Cost for small organisations.
    b. Storage and GDPR considerations.
    c. Consistency and quality of images.
    d. Confusion given not currently mandated across the REC and CoMCoP for other Parties.

Members therefore agreed that photographic evidence should be included as best practice but not mandated for SIPs. Organisations that do not take photographs should implement an alternative form of evidence.

- Customer characteristics. SIPs should be careful of signs of vulnerability when going on site. They should signpost Consumers to their Energy Suppliers or the Priority Services Register (PSR)where appropriate. Members agreed to further discuss the possibility to develop industry best practice on how operatives should respond when identifying vulnerability on site.

6. Recording and reporting of information about failed tests or unsafe conditions

Members agreed that:

- SIPs should follow the same standard testing procedures already agreed upon.
- Existing reporting codes should remain. However, the reporting route should be discussed further.

7. Notification of new versions of equipment

As there is currently no process for DNOs to notify SIPs when introducing a new piece of equipment, Members agreed that the REC Portal would be the best place to do so, specifically the REC Metering Hub. Exactly where this would sit within this hub still needs to be agreed upon once more information about the new Portal is available – it could be on the FAQ page, and/or on a new dedicated SIP section. They also agreed that it would be useful for this information to be published in technical bulletins.

4 SAFETY, INTERFERENCE, TAMPERS, DAMAGE

1. Safety is the overriding priority

Members agreed that:

- Whenever tampering, interference or damage is identified, safety must remain the primary consideration whenever tampering is identified.
- Evidence should be preserved where possible.
- SIPs should avoid interfering with potential evidence of tampering whenever practicable.

2. Stop and report

Members agreed that when tampering is identified, SIPS should:

- Make safe (when possible)
- Stop work
- Report

3. Training and documentation

- Training and competence requirements should address technical hazards, such as reverse polarity, battery systems, solar PV, earthing arrangements, asbestos and BNO installations.
- Notification process should be documented. There was support for ensuring a documented notification process exists for dangerous situations, regardless of whether the issue is resolved on site or passed to another party.

5 SEALING METHODOLOGY

The majority of attendees indicated a preference for the existing methodology. This is due to:

- Proven effectiveness.
- Established industry understanding and knowledge.
- Existing alignment with CoMCoP requirements.
- Existing assurance and control frameworks.

However, there are a few challenges and concerns with this existing methodology:

- Scalability and supplier capacity. There are currently only three providers meaning long lead times (up to 12 weeks).
- Difficulty to maintain the register appropriately.
- Increased risks and additional resources needed.
- Difficulty to distinguish between SIP and MEM activity where identical seals are used.

With any option the below would need to be considered:

- Central control of the sealings.
- Seal usage to be auditable.
- Liability and ownership arrangements need to be clearly defined.
- System to keep the register up to date.

The WG therefore agreed to explore alternative options as it could be beneficial such as the possibility of a SIP-specific sealing methodology, with the suggestion of looking at what the gas industry uses, such as AMI seals. An alternative methodology could:

- Create more competition.
- Support identification of the operative.
- Support audits.
- Potentially improved scalability.

Other suggestions to support the identification and qualification of the operative mentioned were:

- Having a temporary QR code.
- Having Electrotechnical Certification Scheme (ECS) cards.

Some amendments might be needed in CoMCoP depending on the sealing option chosen.

No final decision was reached on sealing methodology on 6 October 2026.

6 REPORTING & MARKET MESSAGES

1. Reporting is required even if the mechanism changes

Members agreed that some form of reporting is still required for:

- Notification of works
- Dangerous situations
- Faults and technical defects
- Meter tampering and revenue protection concerns
- Energisation/de-energisation status updates

2. Possibility for the current reporting mechanism to change

While supporting retention of the information itself, members questioned whether existing Data Transfer Catalogue (DTC) messages through the Data Transfer Service (DTS) system remains the most efficient approach for standalone SIPs. There was support for:

- A system with small standalone SIPs in mind
- Simpler reporting mechanisms such as through portals or centralised routing solutions
- Approaches that minimise complexity while maintaining auditability and assurance requirements

The majority of members believed that the DTC should remain the preferred reporting method. However further consideration is needed before deciding on the reporting mechanism.

7 RECORD KEEPING AND ASSURANCE

1. Evidence retention is required

There was broad agreement that standalone SIP organisations should retain sufficient evidence to support:

- Assurance activities
- Audits
- Dispute resolution
- Investigations

This should be achieved without creating unnecessary reporting burdens.

2. Vulnerability and the PSR

The Working group agreed that vulnerability and the Priority Services Register (PSR) arrangements remain an area that needs further consideration, particularly around:

- Signposting vulnerable consumers
- Potential future information sharing opportunities

It was recognised that SIPs would not be able to send PSR-related market messages because they would not hold the relevant licences.

3. Standardised investigation guidance would be beneficial

Members supported the development of standardised guidance or templates to assist SIPs with:

- Investigations
- Incident reporting
- Evidence gathering

This was seen as particularly valuable for organisations unfamiliar with investigation practices.

8 OPERATIONAL REPORTING

1. Existing safety documentation

Members agreed that the current documentation process could remain largely unchanged when dealing with safety situations, although the resolution route may differ depending on the organisation involved and the level of risk.

2. Immediate escalation for serious safety risks

All members agreed that where there is a risk to life, such as risk of electric shock, SIPs should immediately contact the:

- Consumer
- Energy Supplier
- DNO (as appropriate)

The working group also agreed that contractual obligations should be secondary to CoMCoP safety obligations in such situations.

3. Timescales for less severe issues

Members discussed that less severe issues could be reported within a timeframe of approximately three to five working days and noted there is currently no discrepancy between CoMCoP, NAPIT and ESF timeframes.