RETAIL ENERGY CODE

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01	Initial Assessment Report
02	Preliminary Change Report
03	Final Change Report

PRELIMINARY CHANGE REPORT

R0014 – CABLE COLOUR IDENTIFICATION

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DATE ISSUED	25/01/2022
DOCUMENT APPROVAL STATUS	APPROVED BY RESPONSIBLE COMMITTEE

RESPONSIBLE COMMITTEE	METERING EXPERT PANEL

LEAD ANALYST	Colette Baldwin	EMAIL

CHANGE OVERVIEW

This change seeks to introduce an exception labelling process for when there are shortages of appropriately coloured cables.

CODE MANAGER'S RECOMMENDATION

The Code Manager recommends Change Proposal R0014 is **APPROVED** for implementation on 30 June 2022.

	High Impact: None
	Medium Impact: Metering Equipment Managers, Distribution Network Operators
	Low Impact: Metering Scheme Auditors

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BACKGROUND

1 SUMMARY

During times of supply chain shortages, it is not always possible to source cables with the correct outer sheath colour, as required by the Electricity Meter Operations Code of Practice (MOCoP). Where there is a sustained period of supply shortage, an alternative approach needs to be adopted.

Appendix 9 of the REC Electricity Meter Operation Code of Practice (MOCoP) sets out the obligations for the use of cables with different outer sheath colours from the inner insulation. This legal text does not currently reference the need to label the alternative cables.

The Institution of Engineering and Technology (IET) Wiring Regulations provide an alpha-numeric code to be used which corresponds to the cable colours. This code is set out in Table 51.1 of the IET Wiring Regulations – BS7671:2018, Section 514.

This Change Proposal seeks to update Appendix 9 of the REC MOCoP to include the labelling of cables, in accordance with IET Wiring Regulations, where an alternative outer sheath colour has been used.

This will provide clarity to Metering Equipment Managers and Distribution Network Operators of their obligations in these circumstances and ensure that Metering Scheme Auditors are clear about permissible alternative solutions

2 PROBLEM STATEMENT

During times of sustained supply chain shortages, some colour coded cables may not generally be available. Where this is the case, Metering Equipment Managers (MEMs) and Distribution Network Operators (DNOs) need to be able to source a suitable alternative cable so that they can continue to install and maintain meters. Although the labelling of cables with different outer sheath colours from the inner insulation is covered by the IET Wiring Regulations, this is not set out within the REC Electricity MOCoP.

3 USER STORIES

REF.	USER STORIES
CONSUMER USER STORIES	
C1	As an electricity Consumer, I want requested meter work to take place safely and efficiently at the time and date agreed, so that I have a safe and working meter.
MARKET PARTICIPANT USER STORIES	
M1	As a MEM or a DNO I want clarity on how to deal with cable labelling during periods of coloured cable supply chain shortages, so that I can continue to install or maintain consumer metering.

M2	As a Metering Scheme Auditor, I want there to be clarity on the permitted labelling of non-standard colour coded cables used when connecting meters, so that audits can be appropriately completed.

PROPOSAL

4 SUMMARY OF ANALYSIS UNDERTAKEN

Analysis of the issue identified that it would be beneficial to align the alpha numeric labelling requirement of coloured single and polyphase cables with that of The Institution of Engineering and Technology (IET) Wiring Regulations which provide an alpha-numeric coded label to be used by electricians which corresponds to the cable colours. This code is set out in Table 51.1 of the IET Wiring Regulations – BS7671:2018, Section 514.

5 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

5.1 SERVICE PROVIDER IMPACT ASSESSMENTS

No REC Service Providers are impacted by this proposal. However, the solution will inform the completion of metering audits by the Metering Scheme Auditors.

5.2 REC PARTY IMPACT ASSESSMENTS

METER EQUIPMENT MANAGERS	• The Proposed Solution is that which was considered and assessed by MOCoPA prior to the transition of that agreement into the REC. • Under this Change Proposal, informal consultations were carried out with MEMs prior to the presentation of the Change Proposal to the Metering Expert Panel, who also asked for views from the Association of Meter Operators. • A single respondent indicated they would like to see evidence of the supply chain shortage being retained as evidence for the Scheme Auditor where a different cable colour was used to that traditionally installed. The view also was that colour tails are used for the safety of the customer and reduce the risk of MEMs and electricians who connect to isolators from making a mistake and creating a reverse polarity and ensuring the compliance with the Electricity at Work Act 1989. • The IET Wiring Regulations BS7671 “Requirements for Electrical Installations” does not mandate a link between the requirement for a specific outer coloured sheath to be used to match the inner insulation of the cable, and neither does the Electricity at Work Act 1989. While it may have been considered good practice to retain the relationship between the

	outer sheath colour and the inner insulation colour, it would be dangerous to assume the colour is more important to indicate the safe condition of the site, rather than the MEM or electrician having conducted the necessary safety checks.

6 KEY RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

6.1 RISKS AND ISSUES

No.	RISK	NOTES	MITIGATION
R1	Coloured tails are used for the safety of the customer and reduce the risk of MEMs and electricians who connect to isolators from making a mistake and creating a reverse polarity and ensuring the compliance with the Electricity at Work Act 1989.	The IET Wiring Regulations BS7671 "Requirements for Electrical Installations" does not mandate a link between the requirement for a specific outer coloured sheath to be used to match the inner insulation of the cable, and neither does the Electricity at Work Act 1989	While it may have been considered good practice to retain the relationship between the outer sheath colour and the inner insulation colour, it would be dangerous to assume the colour is more important to indicate the safe condition of the site, rather than the MEM or electrician having conducted the necessary safety checks. It is the responsibility of each MEM to ensure there are sufficient processes and controls in place which are followed by their operatives when working with both standard and non-standard cable colours.

6.2 ASSUMPTIONS AND DEPENDENCIES

No.	ASSUMPTION	NOTES	HOW/WHEN TO VALIDATE
A1	The proposed changes to the REC MOCoP will not impose new obligations on Market Participants, it will clarify the requirements for cable labelling within the REC.	This change will ensure that there is consistency with the IET Wiring Regulations BS7671, which are binding on electricians and will be adopted by MEMs under this Change Proposal.	Closed

7 PROPOSED SOLUTION

The proposed adoption of the alpha numeric code developed under the IET Wiring Regulations provides a consistent approach for MEMs to that used by electricians in respect of cable labelling.

The solution was originally developed under the former MOCoPA governance, and was handed over to the REC. The original legal text proposed was reviewed and aligned with the new MOCoP Schedule under the REC, including ensuring clause references were consistent.

No alternative solutions were considered.

In addition to the consideration by the Metering Expert Panel, views were sought from MEMs and the Association of Meter Operators.

There are no cross-code impacts for this proposal. The Code Manager will consider whether any changes are needed to the scope of future audits to reflect the change, and MEMs may consider seeking a derogation on using different coloured cable sheaths until this change is implemented.

8 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0014 can be found on the Change Proposal Page in the REC Portal.

The Legal text updates Appendix 9 of the MOCoP Schedule, setting out the labelling requirements for coloured single and polyphase (2, 3 or 6 phase) cables.

9 PROPOSED IMPLEMENTATION DATE AND APPROACH

PROPOSED IMPLEMENTATION DATE	30 June 2022

PROPOSED IMPLEMENTATION APPROACH	BIG BANG

We propose this change is implemented in the next standard REC release following approval, on 30 June 2022.

10 CHANGE PATH

CHANGE PATH	SELF-GOVERNANCE

11 RESPONSIBLE COMMITTEE

RESPONSIBLE COMMITTEE	Metering Expert Panel

12 BUSINESS CASE ASSESSMENT

12.1 COST BENEFIT ANALYIS SUMMARY

We have not identified material costs or impacts for implementing this Change Proposal.

It will benefit MEMs at times of supply chain shortages by allowing flexibility on the colour of cables that can be installed, providing that appropriate labelling is used.

It will benefit the Metering Scheme Auditors who will also have confidence on the permitted labelling of non-standard colour coded cables used to connect meters, so that audits can be appropriate completed and avoiding any non-compliance reporting.

13 CASE FOR CHANGE

The Code Manager considers that there is a positive case for change to implement this Change Proposal, on the basis that:

- The proposed solution is fully formed and appropriately resolves the problem statement.
- A benefits case has been made.
- The impact of not implementing the solution will cause difficulties in MEMs being able to connect meters where appropriately coloured cables are unavailable due to supply chain issues, which could lead to unnecessary consumer detriment.
- The implementing of the solution will also align the labelling approach with that used by electricians who complete other electrical work at the premises under the IET Wiring Regulations.

14 CODE MANAGER'S RECOMMENDATION

Based on the business case assessment and the case for change in Sections 12 and 13, the Code manager considers a positive business case can be made for implementing this solution and recommends the Metering Expert Panel:

- **APPROVE** the proposed change solution; and
- **APPROVE** the proposed implementation approach, and
- **APPROVE** the proposed implementation date of 30 June 2022.

15 CONSULTATION PLAN AND NEXT STEPS

The consultation on this Preliminary Change Report for R0014 will be published on the REC Portal on **17 January 2021** and will close on **7 February 2022.**

Following consultation, the Code Manager will produce an updated version of this Preliminary Change Report (referred to as the Final Change Report). This will include the outcome of the consultation, setting out a summary of the consultation submissions and the Code Manager's response.

The Final Change Report will be issued to the Metering Expert Panel to make its determination.

16 APPENDIX

CHANGE PROPOSAL	Change Proposal page
LEGAL DRAFTING	Link to Change Set in EMAR