



CONTESTABILITY WORKING GROUP

7 JUNE 2022

Approach to Non-Routine Work

- ‘Routine’ Live LV Work is defined in the NIE Networks Safety Rules and can proceed without instructions from an SAP:
 - SRI 13 Attachment 1, Routine live LV work on overhead lines, underground cables, customers’ premises & substations.
 - SRI 13 Attachment 2, Routine live LV work which may be undertaken unaccompanied.
- Works not covered by these documents are classified as ‘Non-Routine’.
- Non-Routine work
 - requires SAP input and may require an outage.
 - typically involves modifications or alterations to existing plant.
- These works can be preparatory to making the final connection and are currently Non-contestable.
- NIE Networks considers that these types of Non-Routine works should remain Non-contestable, which would make the final connection straightforward for the ICP.

A decision is required regarding this proposed Contestable / Non-contestable split

Example of Non-Routine Work



- NIE Networks understands that ICPs may, when working on the GB Distribution System, operate under the local DNO's Safety Rules or under their own Safety Rules, which will be based on the Model Safety Rules.
- NIE Networks did not go down the Model Safety Rules route and its Safety Rules are therefore different in certain areas.
- The expansion of contestability to include final LV connections has required NIE Networks to consider which Safety Management System (including Safety Rules) ICPs shall operate under when making the final LV connection to the Northern Ireland Distribution System.
- NIE Networks now considers that when undertaking the Contestable Works ICPs shall operate under their own Safety Rules, including when making the final LV connection.
- This will require ICPs to authorise their own employees and those of any contractors.
- An assessment of ICP Safety Rules will be required.

This is an important policy decision for the project and NIE Networks welcomes views at this stage from the CWG

Access Agreement

- The first draft of a Network Access Agreement has been circulated within NIE Networks for comment.
- It sets out, among other things:
 - Conditions precedent to an ICP carrying out works on the Distribution System
 - Obligations on the ICP
 - Safety
 - The scope of assistance which may be provided by NIE Networks
 - Inspection regime
 - Subcontracting, and
 - The usual legal clauses – termination, Force Majeure, liability etc.
- Comments have been fed back for further development of the document
- Our external solicitors are based in GB and it is expected that the final access agreement will not be too dissimilar to GB equivalents.

Loan Agreement

- The NIE Networks' Safety Rules specify the use of a VODCA device to establish if a PILC cable is energised at either LV or HV.
- It is recognised that VODCA devices are scarce and are not widely accessible to ICPs.
- While it remains the responsibility of ICPs to identify the correct cable, NIE Networks will, in exceptional circumstances, make a VODCA device available under a loan agreement.
- Substation and equipment access keys will also be made available through a loan agreement.
- Charges for this service will be set out in the Statement of Connection Charges.