



Department for
Business, Energy
& Industrial Strategy

Smart Metering Implementation
Programme
Department for Business, Energy &
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FOI2018/11241

13 June 2018

Dear Mark Salter,

Thank you for your email of 3 May 2018 where you made the following requested for information following an item on BBC1's Watchdog programme:

"Please now provide:-

- all documentation detailing the steps that must be undertaken for followed as part of these checks.
- any training documentation provided by or received by your department that mentions these safety checks
- the last 10 reports that detail a "safety problem" found and the rectification undertaken; 5 for electricity meters and 5 for gas meter.

Please also provide a redacted copy of the paper notes used during the Watch Dog interview.

Finally please provide the official figures that detail your "almost 5 million installations and 250,000 safety problems actually found."

Under the Freedom of Information Act 2000 ('the Act'), you have the right to:

- know whether we hold the information you require
- be provided with that information (subject to any exemptions under the Act which may apply).

We have considered each of your request in turn:

1. All documentation detailing the steps that must be undertaken for followed as part of these checks.

We can confirm that the Department holds the information you have requested. This information is already in the public domain and is therefore exempt under Section 21 of the Act, as we are not required to provide information which is already reasonably accessible to you. However, in

order to aid your review, we have provided links to the relevant websites and a brief summary of each.

The Gas Safety (Installation and Use) Regulations 1998:

<http://www.legislation.gov.uk/ukxi/1998/2451/contents/made>

All gas suppliers are required to adhere to the Gas Safety (Installation and Use) Regulations. The items of relevance include:

- When any work is carried out on a gas fitting (e.g. a meter replacement) a procedure known as a 'tightness test' is required to be carried out. Meter installers conduct two of these tests, the first is to establish the gas pressure before meter installation, and the second is to establish the gas pressure after the meter installation. This safety check will help identify if the work undertaken has caused a gas leak.
- Gas engineers carrying out any gas work that become aware of a gas appliance that cannot be used without constituting a danger to any person are required to take all reasonably practicable steps to inform the customer.
- It is an offence for a person to use a gas appliance after they have been advised it constitutes a danger.

The Meter Asset Managers Code of Practice (MAMCOP):

<https://spaa.co.uk/SitePages/SPAA-documents.aspx?btn=MAMCoP>

The MAMCOP reiterates the points in the Gas Safety (Installation and Use) Regulations, as well as outlining the 'duty of cooperation' which requires installers to liaise with other parties involved with the safe and secure supply of gas to premises. This accounts for some of the c.190,000 pre-existing issues identified and resolved by the electricity and gas networks, helping to protect and improve safety (as referred to in Section 5 below).

Institution of Gas Engineers & Managers (IGEM) G11 Gas Industry Unsafe Situations

Procedure: <https://www.gassaferegister.co.uk/media/2622/igem-g-11-gas-industry-unsafe-situations-procedure-april-2018-amendments.pdf>

The IGEM Gas Industry Unsafe Situations Procedure (GIUSP) outlines the recommended minimum checks to enable compliance with the Gas (Installation and Use) Regulations. The items of relevance include:

- When working on gas installations, engineers will carry out visual safety checks of the customer's gas appliances. The gas engineer will check for signs of distress (e.g. discoloration, evidence of heat damage), the stability of the appliance, and to confirm if the location, flueing and ventilation are suitable. This will help enable them to identify signs of spillage, evidence of poor or incomplete combustion and to consider whether the general condition of the gas appliance is appropriate.
- Engineers are not required to record the results of the visual risk assessment. However, if an unsafe situation is identified or is suspected, they are required to complete and issue relevant warning notices and labels. This accounts for some of the c.80,000 safety notices issued to consumers during installations (as referred to in Section 5 below).

Gas Supplier Standard Licence Conditions – Condition 29, Gas Safety:

<https://www.ofgem.gov.uk/licences-industry-codes-and-standards/licences/licence-conditions>

All gas suppliers are required to adhere to Standard Licence Conditions for such suppliers. The items of relevance include:

- The volume of activity being undertaken by suppliers as a result of the Smart Metering programme is helping to identify gas customers that would benefit from being on the Priority Services Register (PSR). This gives eligible consumers access to various rights including a free annual gas safety check.
- Suppliers are required to provide their customers with annual information relating to the safe use of gas appliances (e.g. the benefits of gas safety checks) and the dangers of carbon monoxide poisoning (e.g. the benefits of fitting an audible carbon monoxide alarm). This is also reiterated in the Smart Metering Installation Code of Practice (SMICOP) (available here: <http://www.smicop.co.uk/SitePages/Home.aspx>).

Electricity Supplier Standard Licence Conditions – Condition 26, Priority Service Register:

<https://www.ofgem.gov.uk/licences-industry-codes-and-standards/licences/licence-conditions>

All electricity suppliers are required to adhere to Standard Licence Conditions. Of relevance:

- The volume of activity being undertaken by suppliers as a result of the Smart Metering programme is helping to identify electricity customers that would benefit from getting Priority Services.

The Meter Operation Code of Practice Agreement (MOCOPA®): http://mocopa.org.uk/wp-content/uploads/2017/12/MOCOPA_v4.0.pdf

The Meter Operation Code of Practice Agreement (MOCOPA) is an agreement between Electricity Distribution Businesses and Electricity Meter Operators in Great Britain which defines safety, technical and business interface requirements regarding the provision of meter operation services. In particular:

- The agreement recommends onsite working procedures which include the visual inspection of the customers electrical installation at the service position, to identify signs of risk. If identified the engineer will inform the customer of the risk and any preventative actions required. This accounts for some of the c.80,000 safety notices issued to consumers during installations (as referred to in Section 5 below).
- The agreement requires meter installers to report dangerous or hazardous defects identified with the Distribution Business equipment directly to the distribution business for resolution. Examples of defects are outlined in The Service Terminations Issue Guide (available here: <https://mocopa.org.uk/wp-content/uploads/2018/.../MOCOPA-guide-version-3.5.pdf>). This accounts for some of the c.190,000 pre-existing issues identified and resolved by the electricity and gas networks, helping to protect and improve safety (as referred to in Section 5 below).

British Electrotechnical and Allied Manufacturers Association (BEAMA) and Electrical Safety First (ESF) Consumer Unit Connections Technical Guide:

<http://www.beama.org.uk/resourceLibrary/beama-esf-consumer-unit-connections-technical-guide.html>

This guidance produced by BEAMA and Electrical Safety First, provides practical advice and guidance on achieving safe and reliable connections for devices and terminal bars within consumer units and similar switchgear.

2. Any training documentation provided by or received by your department that mentions these safety checks

We can confirm that the Department holds information in scope of your request. This information is attached and titled *Annex 1: 2646 Smart Metering Upskilling SAR Draft 8.0, Annex 1.1 2519 Assurance Visit Guidance Provider and Product Approval, Annex 1.2 Smart Specification Mapping Document, Annex 1.3 Smart Metering Elec NAS v2, Annex 1.4 Smart Metering NAS GAS LOW, Annex 1.5 Smart Metering GAS MED, Annex 1.6 Guidance on Gas Service Termination Issues, Annex 1.7 MOCOPA Guide Version 3.5.*

Energy suppliers are required to comply with the Smart Meter Installation Code of Practice, meaning energy suppliers must make sure that installers are appropriately trained and are accredited by the National Skills Academy for Power (NSAP) or its equivalent, as well as Gas Safe Registered.

The attached document has been developed jointly by Energy & Utilities Skills (EU Skills) and The National Skills Academy for Power (NSAP) and sets out the National Assessment Specification for each element of the smart metering training standard. This includes several safety checks/practices that trainees are expected to be able to demonstrate to be deemed competent. This document continues to be revised in the light of operational experience.

3. The last 10 reports that detail a "safety problem" found and the rectification undertaken; 5 for electricity meters and 5 for gas meter.

We can confirm that the Department does not hold information in scope of your specific request.

If an unsafe situation is identified or is suspected, engineers are required to complete and issue relevant warning notices and labels directly to the customer. Additionally, the engineer will identify and report defects with the incoming gas supply to the relevant Gas Network for resolution and identify and report defects with the incoming electricity supply to the relevant Electricity Network for resolution. The department does not hold these reports.

4. Please also provide a redacted copy of the paper notes used during the Watch Dog interview.

We can confirm that the Department holds information in scope of your request. This information is being withheld under Section 36(2)(b) of the FOI Act.

Section 36 (Prejudice to effective conduct of public affairs) subsection (2)(b)(ii) applies in relation to information which, in the opinion of a qualified person, would or would be likely to (i) inhibit the free and frank provision of advice, or (ii) the free and frank exchange of views for the purposes of deliberation. In this case a qualified person gave their opinion that the exemption applies to this information.

Section 36 of the Act is a qualified exemption and requires the public interest to be considered on a case by case basis.

There is a general public interest in the disclosure of information as greater transparency makes Government more accountable and there is a public interest in being able to assess the quality of information and advice which is used. However, against this there is a public interest in ensuring that government decision-making can proceed in the self-contained space needed to ensure that it is done well.

The withheld information relates to the exchange of advice between departmental officials and Ministers. In considering this case, it is relevant to consider if the advice made in an internal document was made public, frankness would inevitably be inhibited, and decisions on smart

metering would be made without full consideration of the issues. After consideration it was concluded that were this information to be disclosed in the public domain then this may have a detrimental effect on the deliberation of government officials and ministers and on that basis the information should not be disclosed on this occasion.

5. Finally please provide the official figures that detail your "almost 5 million installations and 250,000 safety problems actually found".

We can confirm that the Department holds information in scope of your request.

The information relating to safety related issues is based on data compiled by industry parties and are not official statistics. During 2017 over 270,000 pre-existing safety related issues not related to smart metering were identified. Of these:

- over 80,000 were drawn to the specific attention of householders related to potentially unsafe appliances or related issues via safety warning notices issued by the installer; and
- over 190,000 were identified by the installer for action to be taken by the energy network organisations related to connections to energy supply.

All of which makes a positive contribution to household safety.

The remainder of the information requested is already in the public domain and is therefore exempt under Section 21 of the Act as we are not required to provide information which is already reasonably accessible to you.

The official smart metering installation statistics are available on the following website:
<https://www.gov.uk/government/statistics/statistical-release-and-data-smart-meters-great-britain-quarter-4-2017>

Appeals procedure

If you are dissatisfied with the handling of your request, you have the right to ask for an internal review. Internal review requests should be submitted within two months of the date of receipt of the response to your original request and should be addressed to the Information Rights Unit:

Information Rights Unit
Department for Business, Energy and Industrial Strategy
1 Victoria Street
London
SW1H 0ET
Email: FOI.Requests@beis.gov.uk

Please remember to quote the reference number above in any future communications.

If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Yours sincerely,

Smart Metering Implementation Programme