

## Company Directive

### STANDARD TECHNIQUE: OS7H/3

#### Relating to due diligence checks on independent Connection providers and operational induction arrangements for third party SAP(s)

##### Document Summary

This document details Company operational requirements for Independent Connection Providers (ICPs) who request access to the NGED High Voltage Distribution Network for operations/work and includes arrangements for induction of staff imported under NEWSAC.

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**Approved by:**



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Target Staff Group	All staff involved with management of ICPs and imported SAPs
Impact of Change	Green – no change to content – typographical changes only
Planned Assurance checks	To be carried out by sample consultation with the author of this document

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## **IMPLEMENTATION PLAN**

### **Introduction**

This document details Company operational requirements for Independent Connection Providers (ICPs) who request access to the NGED High Voltage Distribution Network for operations/ work and includes arrangements for induction of staff imported under NEWSAC.

### **Main Changes**

Document is reviewed – reformatted and minor typographical changes/ corrections that have no impact on the application of the arrangements set out in this document.

### **Impact of Changes**

None.

### **Implementation Actions**

Line managers shall ensure their relevant staff are aware of this document.

### **Implementation Timetable**

This document shall be implemented by the continued application of existing procedures.

## REVISION HISTORY

Document Revision & Review Table		
Date	Comments	Author
August 2023	<ul style="list-style-type: none"><li>Document reviewed – no changes made.</li><li>Format updated and typographical changes only.</li></ul>	John Perry
August 2020	<ul style="list-style-type: none"><li>Document reviewed – no changes made.</li><li>Format updated and typographical changes only.</li></ul>	John Perry
August 2017	<ul style="list-style-type: none"><li>Document re-titled and re-written to include WPD Option 4 for self-connect work and arrangements for staff imported under NEWSAC.</li></ul>	John Perry
February 2016	<ul style="list-style-type: none"><li>New document issued.</li></ul>	John Perry

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## **1.0 INTRODUCTION FOR ICP DUE DILLIGENCE PROCESS**

- 1.1 Before Access to the National Grid Electricity Distribution (NGED) Distribution System is granted to an Independent Connection Provider (ICP) NGED will carry out reasonable checks as required in section 1.2 below.
- 1.2 The Competition in Connection Code of Practice will allow NGED to make reasonable checks before allowing an ICP access to the NGED Network.
- “The DNO will be entitled to carry out reasonable checks on the application of the relevant SMS to demonstrate so far as reasonably practicable to the Health and Safety Executive (or other interested parties) that safety assurance is in place for any ICP working on its Distribution System.”
- 1.3 Due diligence checks shall be carried out which will enable NGED to achieve their duty of care with regard to the electrical distribution system.
- 1.4 NGED will carry out a check on the ICP Safety Management System (SMS) and Operational Site Checks. These checks do not form an approval or accreditation from NGED.
- 1.5 Prior to the Planning and Facilitation Meeting the NGED person nominated to liaise with the ICP shall check the current status of the ICP on the “ICP Status spreadsheet” found in the Safety Resources Catalogue on the Safety & Training Web page to ascertain if ICP status is correct for the work/operation type requested and also record the ICP status on the relevant “Planning and Facilitation Document” also found in the Safety Resources Catalogue on the Safety & Training Web page.

## **2.0 INITIAL APPLICATION**

- 2.1 Any initial enquiry to carry out work under this process shall be referred initially to the policy team at Pegasus.
- 2.2 The ICP shall be accredited under the National Electricity Registration Scheme (NERS) with the appropriate scopes covering the work they wish to undertake. The NERS scheme is currently administered by Lloyds Register. The ICP shall have staff with adequate and recognisable CVs, training records and authorisations in accordance with the ICP’s DSRs.

Prior to NGED allowing an ICP to carry out any physical works NGED must ensure that the ICP shall either:

- be Fully Accredited, with an Framework Network Access and Adoption Agreement in place and the ICP operatives must have appropriate Lloyd’s scopes and accreditations or;
- where the ICP holds only Partial Accreditation the ICP shall also be following the appropriate NERS process leading to Full Accreditation.

2.3 Any operatives who are required by the ICP to carry out physical work on NGED's distribution system shall:

- hold a current NERS passport or an approved alternative with the relevant scopes and accreditation;
- be suitably competent and authorised by the ICP for the various stages of the intended works or activity under the ICP's DSRs or as detailed in 2.2.2 above and;
- have received basic health and safety training (i.e. avoidance of danger and risk assessment) and emergency first aid training including resuscitation.

2.4 To ensure compliance with the Code of Practice NGED have made 4 options available to an ICP. The ICP shall nominate which option they will be complying with when working on the NGED network from the following table:

Competition in Connections Code of Practice	Option 1	Option 2	Option 3	Option 4 (not yet included in Code)
Description	ICP Work to their own DSRs Procedures and Policy. ICP Authorise their own Staff.	ICP works to NGED DSRs Procedures and Policy. NGED Authorise ICP Staff.	NGED transfers control of a specific part of the distribution system to ICP control Only available with Option 1	ICP authorised SAP Switches to NGED DSRs procedures and Policy. Identification, Work and testing under ICP DSRs procedures and Policy.

2.5 For LV, only Option 1 and Option 2 are available and submission of a Safety Management System is not required for either.

2.6 For HV, the ICP shall for Option 1 and Option 4 provide a detailed Safety Management System (SMS) to the NGED Safety Team prior to the start of any Operational activity. The NGED Safety Team shall carry out the SMS checks as described in subsequent sections of this Standard Technique within 8 weeks from submission of the SMS.

2.7 The ICP shall state which option that they are working to at LV and/or HV. The Option chosen for LV may be different to that chosen for HV. The ICP shall only then carry out LV Work to the declared LV Option and HV Work to the declared Option. Switching to an alternative Option is only allowed in exceptional circumstances and agreed by the ICP and NGED.

2.8 The Safety Team shall publish the Option that the ICP has elected to work in compliance with for LV and/or HV. This information shall be made available on the Safety and Training Resources Catalogue.

### 3.0 SAFETY MANAGEMENT SYSTEM (SMS) & OPERATIONAL SITE CHECKS

#### 3.1 SMS checks for an ICP who select Option 1.

- 3.1.1 The ICP will provide via submission or meeting at the time of their first application to access the NGED Distribution Network their SMS for checking. The objective of the check is to ensure that the ICP operational procedures & distribution safety rules are as a minimum equivalent to NGED Policy & Standard techniques, and the ENA Model Distribution Safety Rules.
- 3.1.2 These checks will be carried out by a member of the Operational Safety team who will utilise and complete the “SMS checklist/record form” found in Safety Resources Catalogue on the Safety & Training Web page.
- 3.1.3 Upon completion, the reports shall be sent to the NGED Safety Team for retention and circulation to the ICP, Lloyds Register, and the NGED Distribution Manager for the area the work is proposed.
- 3.1.4 The ICP when informed of the results of the check will then have an opportunity to rectify any deficiencies identified and resubmit for a re-check. Upon successful submission of the SMS the ICP will be allowed to progress to the Planning and Schedule of Responsibilities Meeting.

#### 3.2 Operational Site Checks for an ICP who select Option 1.

- 3.2.1 ICP work on the NGED Distribution Network shall be allowed in progressive stages. The initial stage for the ICP to be appointed to will be decided by a NGED Operational Safety Advisor following examination of the ICP's relevant experience. Progression through the stages will be as per the table of operational activities below. With the exception of Overhead Line work jumping stages is not permitted.

Table of Operations										
Operational status	Actual jobs completed	Two way section RMU	Three way section RMU	Multiple sections RMU	Making and breaking jumpers	Multi panel board	Installation of Pole type equipment	Primary boards	Moving system split points	Operational Control with a customer interface
Stage 1		Yes	No	No	No	No	No	No	No	No
Stage 2		Yes	Yes	No	No	No	No	No	No	No
Stage 3		Yes	Yes	Yes	No	No	No	No	No	No
Stage 4		Yes	Yes	Yes	Yes	No	No	No	No	No
Stage 5		Yes	Yes	Yes	Yes	Yes	No	No	No	No
Stage 6		Yes	Yes	Yes	Yes	Yes	Yes	No	No	No
Stage 7		Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No
Stage 8		Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No
Stage 9		Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes

- 3.2.2 At the initiation of each operational stage the first 5 jobs completed will be subject to an ICP Operational Site Checks. Following the first 5 mandatory checks any further Operational Site Checks will be carried out on a random basis.

- 3.2.3 The Operational Site Checks will be carried out by a NGED Senior Authorised Person (SAP) who holds Field Control, Operational Safety Advisor, or Examining Officer for the appropriate authorisation level.
- 3.2.4 The Person completing the checks shall complete a written report for each check using the "ICP Operational Check Form" form found in the Safety Resources Catalogue on the Safety & Training Web page. The completed reports shall be sent to the NGED Safety Team for retention and circulation to the ICP, Operational Safety Advisor for that area, Distribution Manager for the area, and Lloyds Register.
- 3.2.5 If a check reveals minor deficiencies, not affecting safety, the person carrying out the check shall record the details on the report form. If the person carrying out the checks observes a deficiency that they consider to be unsafe, the ICP operations shall be suspended immediately. The NGED Control Centre, the local NGED Distribution Manager, and the NGED Safety and Environment Manager shall be informed immediately to discuss the unsafe deficiency and agree any immediate action required to ensure safety.
- 3.2.6 Completed checks that identify minor deficiencies or differences when compared to NGED Standard Technique & Distribution Safety Rules shall be investigated by the NGED Operational Safety Advisor for that area. The NGED Operational Safety Advisor shall establish if the item raised is an actual deficiency or a difference in operational procedure that is allowed within the checked ICP SMS. Actual deficiencies shall be reported by the Operational Safety Advisor who completed the investigation to the ICP for resolution. Details of actions taken by the ICP to resolve deficiencies shall be reported to the NGED Operational Safety Advisor who completed the initial investigation and recorded in the ICP Status spreadsheet.
- 3.2.7 Access to the NGED High Voltage Distribution Network for work/operations by the ICP shall not be allowed until all deficiencies are adequately resolved. All deficiencies and unsafe practice identified shall also be reported to Lloyds Register.
- 3.3 **Due diligence checks for ICP who select Option 2.**
- 3.3.1 For Option 2 the ICP will not be subject to due diligence checks as they will be authorised directly by NGED and will operate to all relevant NGED Policies and Standard Techniques.
- 3.4 **Due diligence checks for ICP Option 3.**
- 3.4.1 Option 1 is facilitated using Option 3 which transfers the Control of a defined section of network to the ICPs Control Room. Option 3 therefore does not require an SMS or Operational Site Check to be carried out.



### **3.5 SMS checks for an ICP who select Option 4.**

- 3.5.1 The ICP will provide via submission or meeting at the time of their first application to access the NGED Distribution Network their SMS for checking. The objective of the check is to ensure that the ICP operational procedures & distribution safety rules are as a minimum equivalent to NGED Policy & Standard techniques, and the ENA Model Distribution Safety Rules.
- 3.5.2 These checks will be carried out by a member of the Operational Safety team who will utilise and complete the “SMS checklist/record form” found in Safety Resources Catalogue on the Safety & Training Web page.
- 3.5.3 Upon completion, the reports shall be sent to the NGED Safety Team for retention and circulation to the ICP and the NGED Distribution Manager for the area the work is proposed.
- 3.5.4 The ICP when informed of the results of the check will then have an opportunity to rectify any deficiencies identified and resubmit for a re-check. Upon successful submission of the SMS the ICP will be allowed to progress to the Planning and Facilitation Meeting.

### **3.6 Operational Site Checks for an ICP who select Option 4.**

- 3.6.1 ICP Operational Activities to establish a work area within the NGED Distribution Network shall be carried out in accordance with NGED Distribution Safety Rules, Policies and Standard Techniques. The ICP SAP will carry out these Operational Activities under the appropriate ICP authorisation and not NGED authorisation.
- 3.6.2 Work within the established work area shall be carried out under ICP Distribution Safety Rules, Policies and Procedures.
- 3.6.3 The ICP SAP must hold the appropriate ICP authorisation for the operations proposed.
- 3.6.4 The ICP SAP must have attended the NGED Operational Briefing and successfully completed the appropriate NGED Operational Briefing Test. The current version of the NGED Operational Briefing Test can be found at:

<\\AVODCS01\DMS\MA\OS\OS007\OS007H\WPD Operational Briefing Test.docx>

- 3.6.5 The Results of the ICP own Operational Site Check and annual CBT for each ICP SAP shall be provided to the NGED Safety Team.
- 3.6.6 As a minimum the first 5 jobs completed by an individual SAP will be subject to an ICP Operational Site Checks. Further checks may be required if deemed necessary by NGED following review. Following this any further Operational Site Checks will be carried out on a random basis. The appropriate ICP Operational Site Check Form can be found at:

<\\AVODCS01\DMS\MA\OS\OS007\OS007H\ICP Operational Site Check Form.docx>

- 3.6.7 When the ICP Operational Site Checks have been successfully achieved then the ICP shall annotate the ICP SAP authorisation certificate with “NGED HV Operations” or a suitable annotation pre agreed with the NGED Safety Team.
- 3.6.8 The ICP Operational Site Checks will be carried out by a NGED Senior Authorised Person who holds Field Control, Operational Safety Advisor, or Examining Officer for the appropriate authorisation level.
- 3.6.9 The Person completing the checks shall complete a written report for each check using the “ICP Operational Check Form” form found in the Safety Resources Catalogue on the Safety & Training Web page. The completed reports shall be sent to the NGED Safety Team for retention and circulation to the ICP, Operational Safety Advisor for that area and the Distribution Manager for the area.
- 3.6.10 If a check reveals minor deficiencies, not affecting safety, the person carrying out the check shall record the details on the report form. If the person carrying out the checks observes a deficiency that they consider to be unsafe, the ICP operations shall be suspended immediately. The NGED Control Centre, the local NGED Distribution Manager, and the NGED Safety and Environment Manager shall be informed immediately to discuss the unsafe deficiency and agree any immediate action required to ensure safety.
- 3.6.11 Completed checks that identify minor deficiencies shall be investigated by the NGED Operational Safety Advisor for that area. Findings of the investigation shall be reported by the Operational Safety Advisor who completed the investigation to the ICP for resolution. Details of actions taken by the ICP to resolve deficiencies shall be reported to the NGED Operational Safety Advisor who completed the initial investigation and recorded in the ICP Status spreadsheet.
- 3.6.12 Access to the NGED High Voltage Distribution Network for work/operations by the ICP shall not be allowed until all deficiencies are adequately resolved. All deficiencies and unsafe practice identified shall also be reported to Lloyds Register.

## **4.0 RECORDS**

- 4.1 The NGED safety team will update to reflect the current status of an ICP the “ICP Status spreadsheet” found in the Safety Resources Catalogue on the Safety & Training Web page. The ICP Status spreadsheet will show the SMS check status, operational development stage, Operational Site Check Status, ICP SAP Operational Audit Status, ICP SAP annual field check, ICP SAP Test results, deficiencies identified and action taken to resolve any deficiencies.

## **5.0 NETWORK ACCESS FOR NON NGED DNO STAFF**

- 5.1 In the event of significant network incidents and faults the importing of non NGED DNO staff may be necessary. This can be facilitated primarily under the NEWSAC arrangements.

- 5.2 The non NGED DNO SAP(s) operational activities to establish a work area within the NGED Distribution Network shall be carried out in accordance with NGED Distribution Safety Rules, Policies and Standard Techniques.
- 5.3 The non NGED DNO SAP(s) will carry out these Operational Activities under their appropriate DNO authorisation and not NGED authorisation.
- 5.4 When all operational control measures are in place to create a work area the work shall be carried out under the non NGED DNO Distribution Safety Rules, Policies and Procedures.
- 5.5 To ensure that the non NGED DNO SAP(s) are conversant with the NGED Distribution Safety Rules, Policies and Procedures the non NGED DNO SAP(s) must have attended the NGED Operational Briefing and successfully completed the appropriate NGED Operational Briefing Test on completion of the briefing. The current version of the NGED Operational Briefing Test can be found at:

[\\AVODCS01\DMS\MA\OS\OS007\OS007H\WPD Operational Briefing Test.docx](#)

Details of the persons successfully completing the test shall be sent to the NGED Safety team for recording on the ICP status spreadsheet.

## **APPENDIX A**

### **SUPERSEDED DOCUMENTATION**

This document supersedes ST: OS7H/2 dated August 2020, which is withdrawn.

## **APPENDIX B**

### **ASSOCIATED DOCUMENTATION**

- ST: NC2L Relating to Independent Connection Provider (ICP) High and Low Voltage Connections under ICP DSRs
- ST: OC1K Relating to Transfer of Control of NGED Network between NGED Central Control and ICP Control
- ST: OC1L Relating to the Operational Procedure for Independent Connection Providers carrying out HV Connection Works under Option 4 of the ICP Self Connect Process

Energy Networks Association Competition in Connections Code of Practice

## **APPENDIX C**

### **RECORD OF COMMENTS DURING CONSULTATION**

[ST: OS7H/3 - Comments](#)

## **APPENDIX D**

### **KEY WORDS**

Independent Connection Provider (ICP), Safety Management System (SMS), Operational Site Checks, NEWSAC.