

Company Directive

STANDARD TECHNIQUE: OS7H/1

Relating to due diligence checks on ICP safety management systems and ICP operational site performance as well as operational induction briefings and tests for non WPD Authorised SAP(s)


Policy Summary

This document details Company requirements for a program of Safety Management System (SMS) and Operational Site Checks carried out by Western Power Distribution on Independent Connection Providers (ICP) who request access to the Western Power High Voltage Distribution Network for operations/work. This document also includes the arrangements for operational induction briefings and associated tests for ICP and staff imported under NEWSAC arrangements.

Author: **John Perry**
Operational Safety Advisor

Implementation Date: **31st August 2017**

Approved by



Lee Wallace
Safety and Training Manager

Date:

29 August 2017

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IMPLEMENTATION PLAN

Introduction

This document details Company requirements for a program of Safety Management System (SMS) and Operational Site checks carried by Western Power Distribution on Independent Connection Providers (ICP) who request access to the Western Power High Voltage Distribution network for work/operations. It also includes the arrangements for operational induction briefings and associated tests for ICP and staff imported under NEWSAC arrangements.

Main Changes

Document re titled and re written to include a WPD alternative option for access arrangement to the WPD Network – Option 4, inclusion of elements of ST:NC2L, as well as the arrangements for operational induction briefings and associated tests for ICP and staff imported under NEWSAC arrangements.

Impact of Changes

The WPD Safety Team will be required to manage the recording of the status of ICP operational task stages and complete initial SMS checks. Network Services' staff will be required to check the status of an ICP prior to their Planning and Facilitation Meeting & to carrying out operational site checks.

Implementation Actions

Line Managers shall brief their relevant staff on the contents of this document.

Safety Manager shall make arrangements to record the current status of ICP using the ICP Status spreadsheet.

The WPD Operational training brief will need to be formally made available to Distribution Managers at each WPD Network Services sites.

Implementation Timetable

The process outlined within this document shall be implemented with immediate effect.

REVISION HISTORY

Document Revision & Review Table		
Date	Comments	Author
August 2017	Re titled and re written to include WPD Option 4 for ICP Self Connect Work, inclusions from ST:NC2L, and the arrangements for operational induction briefings and associated tests for ICP and staff imported under NEWSAC arrangements.	John Perry
February 2016	New document issued	J Perry

1.0 INTRODUCTION FOR ICP DUE DILLIGENCE PROCESS

- 1.1 Before Access to the Western Power Distribution (WPD) Distribution System is granted to an Independent Connection Provider (ICP) WPD will carry out reasonable checks as required in section 1.2 below.
- 1.2 The Competition in Connection Code of Practice will allow WPD to make reasonable checks before allowing an ICP access to the WPD 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 WPD to achieve their duty of care with regard to the electrical distribution system.
- 1.4 WPD 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 WPD.
- 1.5 Prior to the Planning and Facilitation Meeting the WPD 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 WPD allowing an ICP to carry out any physical works WPD 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 WPD'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 WPD have made 4 options available to an ICP. The ICP shall nominate which option they will be complying with when working on the WPD 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 WPD DSRs Procedures and Policy. WPD Authorise ICP Staff.	WPD transfers control of a specific part of the distribution system to ICP control Only available with Option 1	ICP authorised SAP Switches to WPD 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 WPD Safety Team prior to the start of any Operational activity. The WPD 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 WPD.

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 WPD 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 WPD 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 WPD Safety Team for retention and circulation to the ICP, Lloyds Register, and the WPD 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 WPD Distribution Network shall be allowed in progressive stages. The initial stage for the ICP to be appointed to will be decided by a WPD 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 boards	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 WPD 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 WPD 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 WPD Control Centre, the local WPD Distribution Manager, and the WPD Safety 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 WPD Standard Technique & Distribution Safety Rules shall be investigated by the WPD Operational Safety Advisor for that area. The WPD 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 WPD Operational Safety Advisor who completed the initial investigation and recorded in the ICP Status spreadsheet.
- 3.2.7 Access to the WPD 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 WPD and will operate to all relevant WPD Policies and Standard Techniques.
- 3.4 **Due diligence checks for ICP Option 3.**
- 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 WPD 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 WPD 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 WPD Safety Team for retention and circulation to the ICP and the WPD 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 WPD Distribution Network shall be carried out in accordance with WPD Distribution Safety Rules, Policies and Standard Techniques. The ICP SAP will carry out these Operational Activities under the appropriate ICP authorisation and not WPD 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 WPD Operational Briefing and successfully completed the appropriate WPD Operational Briefing Test. The current version of the WPD 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 WPD 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 WPD 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 “WPD HV Operations” or a suitable annotation pre agreed with the WPD Safety Team.
- 3.6.8 The ICP Operational Site Checks will be carried out by a WPD 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 WPD 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 WPD Control Centre, the local WPD Distribution Manager, and the WPD Safety 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 WPD 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 WPD Operational Safety Advisor who completed the initial investigation and recorded in the ICP Status spreadsheet.
- 3.6.12 Access to the WPD 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

The WPD 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 WPD DNO STAFF

- 5.1 In the event of significant network incidents and faults the importing of non WPD DNO staff may be necessary. This can be facilitated primarily under the NEWSAC arrangements.
- 5.2 The non WPD DNO SAP(s) operational activities to establish a work area within the WPD Distribution Network shall be carried out in accordance with WPD Distribution Safety Rules, Policies and Standard Techniques.
- 5.3 The non WPD DNO SAP(s) will carry out these Operational Activities under their appropriate DNO authorisation and not WPD 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 WPD DNO Distribution Safety Rules, Policies and Procedures.
- 5.5 To ensure that the non WPD DNO SAP(s) are conversant with the WPD Distribution Safety Rules, Policies and Procedures the non WPD DNO SAP(s) must have attended the WPD Operational Briefing and successfully completed the appropriate WPD Operational Briefing Test on completion of the briefing. The current version of the WPD 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 WPD Safety team for recording on the ICP status spreadsheet.

APPENDIX A

SUPERSEDED DOCUMENTATION

This document supersedes ST:OS7H dated February 2016 which has now been 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 WPD Network between WPD 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

KEY WORDS

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