



 a siteserv company

Commission for Energy Regulation
The Exchange,
Belgard Square North,
Tallaght,
Dublin 24

30th June 2015

To whom it may concern,

Ref: CER15108 Controlled Electrical Works Consultation Paper

Sierra Support Services Response

Sierra Support Services have carried out an analysis of the discussion paper relating to the topic of a proposed change in scope of controlled electrical works, to include the installation / removal of lifestyle choice prepayment meters.

The company's interpretation is that in order to comply with the proposed amendment, compliance would be achieved through the issuing of a sub system certificate, where this work would be considered a modification to the existing fully certified system. Section 63.4.3 of the Wiring Rules (ETCI) would be applicable if this change in scope should come into place. Based on this interpretation, the company would fully endorse the inclusion of Lifestyle Choice meter installation works under the scope of controlled electrical works.

Assumptions based on the above;

- The Lifestyle Choice meter installer, who is a REC will certify the works that have been modified, as part of the Lifestyle Choice Meter Installation works, and will not be certifying the overall system.
- On the basis that the customer's installation is connected to the DSO network, a completion certificate is previously registered with the DSO.
- Tests to the new sub-system would be consistent with current testing requirements, and include fault loop impedance, polarity, voltage, and visual inspection.

Additional comment

- The installation of the Lifestyle Choice meter installation needs to reflect two different installation scenarios in terms of the physical location of the Lifestyle Choice meter as

Sierra Support Services Group
Westland House, Willow Road, Dublin 12, Ireland.

T: +353 1 461 8810 | F: +353 1 461 8839 | E: info@sierra.ie | W: www.sierra.ie

Directors: S. Corkery, A. Doherty, T.J. Malone, P. Carolan
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Registered Office: Westland Park, Hangor Road, Dublin 12, Ireland.



illustrated in Fig 1.0A, which is taken from the above referenced consultation document. The second installation location is based on our experience, whereby the customer circuit breaker / fuse is not always located in the DSO meter cabinet, as per the diagram in the consultation document. This requirement to have the customer circuit breaker / fuse located in the DSO meter cabinet only became the norm in the mid 80's. We attach fig 1.0B which is an alternative location for the Lifestyle Meter based on these comments and experience.

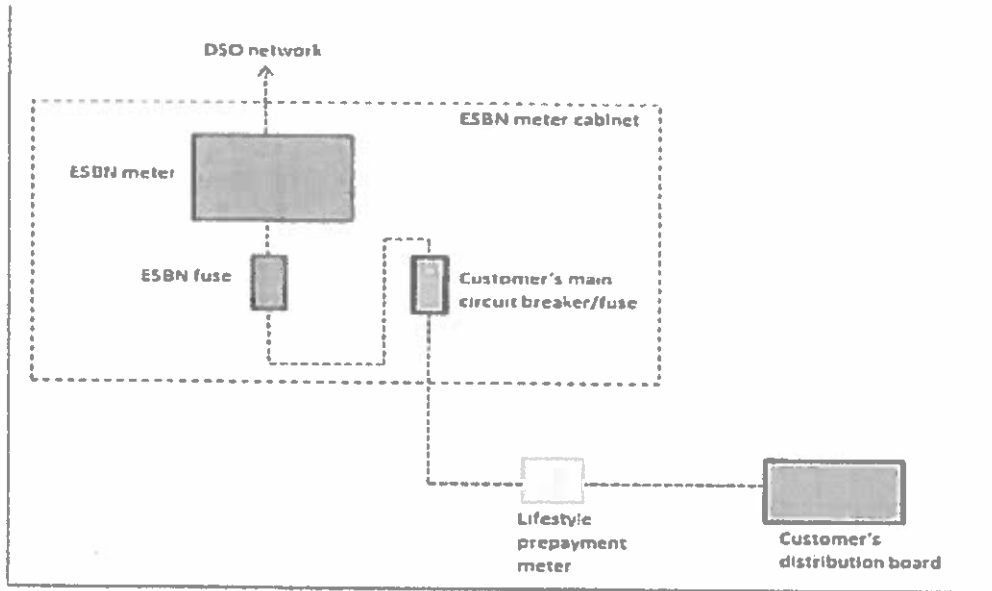


Fig 1.0A

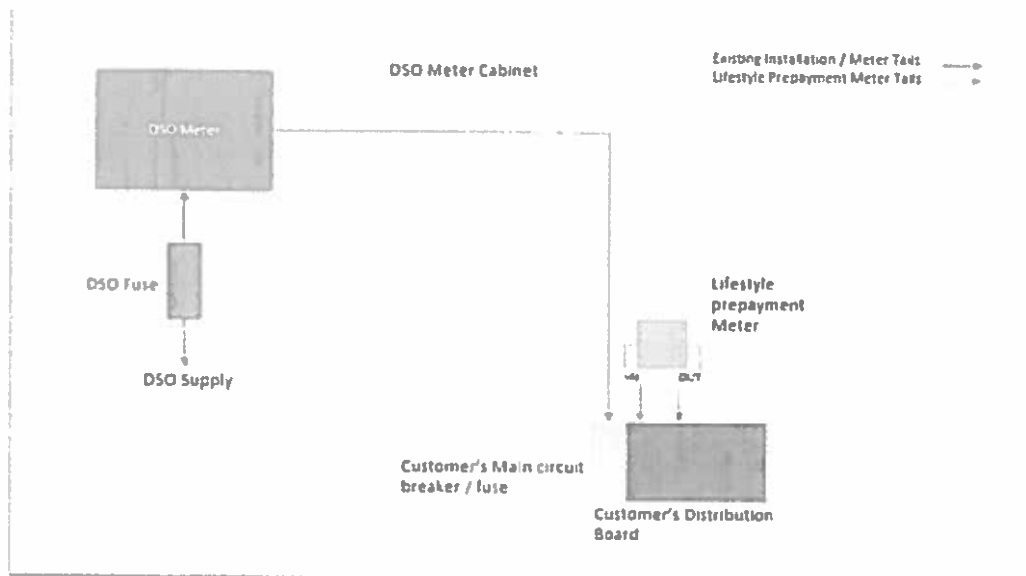


Fig 1.0B

Points to Note;

- If our interpretation in relation to the certification of the meter is incorrect, then the installation of a Lifestyle meter would require certification of the full system. This will add to the cost of the installation of the Lifestyle meter, both in terms of time and expense and would require further discussion with all stakeholders in this market.
- The implementation of this change or our alternative proposal noted below will require additional administration for installers and RECI / ESSCA back office staff to process certificates.

Alternative Proposal

An alternative solution to the proposed amendment would be to change the current process relating to the issuing of minor works certificates to include for minor works certificates to be returned to the SSB. The submission of the Minor Works Certificates to the SSB would provide tractability to these installations.

Sierra Support Services Current Procedures -- Refer to Addendum 1

Please ensure that the appendix is not made available to FOI request due to commercial sensitivity.

A copy of our standard operating procedure is available if you would like to discuss further.

