

Minutes of the 75th NERSAP Meeting

Microsoft Teams 10am 25th November 2025

Attendees:

Paul Wragg (PW)	PowerOn	paul.wragg@poweron-uk.co.uk
Paul Costelloe (PC)	LRQA	paul.costelloe@lrqa.com
Mel Swift (MS)	GTC	mel.swift@gtc-uk.co.uk
Mick Beeby (MB)	Last Mile	mick.beeby@lastmile-uk.com
Matthew Crittenden (MC)	UKPN	matthew.crittenden@ukpowernetworks.co.uk
Ephie Chalakateva (EC)	NGED	ephie.chalakateva@nationalgrid.com
Paul Thomas (PT)	SPEN	paul.thomas@spenergynetworks.co.uk
Tracey Taylor (TT)	SP ENW	tracey.taylor@enwl.co.uk
Dave Ellis (DE)	LRQA	dave.ellis@lrqa.com
Bob Fearnley (BF)	Leep	bfearnley@leeputilities.co.uk
James Barker (JB)	UCCG	jbarker@etl.ltd
David Jones (DJ)	HEA	david@joneslighting.co.uk
Simon Watton (SW)	Fulcrum	simon.watton@fulcrum.co.uk
Keith Montague (KM)	Matrix	keithmontague@matrixgroup.co.uk
Jevan Laxen (JL)	SSEN	jevan.laxen@sse.com
David Hearn (DH)	AEN	david.hearn@advancedelectricitynetworks.co.uk
Cherelle Tooley (CT)	Harlaxton	cherelle@harlaxton.com

Apologies:

Apologies had been received from:

Symon Gray	IDCSL	symongray@idcsl.co.uk
Karl Miller	LRQA	karl.miller@lrqa.com
David McDonald	AEN	david.mcdonald@advancedelectricitynetworks.co.uk

1. Introductions

Introductions were made and new attendees Cherelle Tooley of Harlaxton Energy Networks Ltd and David Hearn of Advanced Electricity Networks Ltd were welcomed.

2. Apologies

Apologies were received from those identified above.

3. Review & Acceptance of Minutes & Actions from NERSAP Meeting of 29th July 2025

The minutes of the previous NERSAP meeting held on 29th July 2025 were accepted as a true record of that meeting. It was agreed to review matters discussed under (4) below as the subjects were similar.

4. Review of Minutes & Actions from NERS ICP Forum of 11th November 2025

PC advised that 146 attendees were present for at least part or all of the meeting.

4.1 SPEN Express Safety Bulletin

PC invited PT to give a recap on this for those who were not aware of this. This involved the back-energisation of a substation transformer from a temporarily connected IDNO generator. This was discussed at the INA Technical Group also. PT confirmed that precautions need to be taken in future to prevent recurrence. PC confirmed that he would recirculate with the minutes of this meeting.

4.2 Content of NERS Requirements Document v11

PC had invited comments from the ICP community on v10 and any suggested areas that needed addition/revision/deletion or clarification for the future version v11. No comments were received. PC extended the invitation for comments to the NERSAP meeting.

4.3 NERS Staffing

PC advised that he had informed the NERS ICP Forum that LRQA were having a new starter in the NERS team commencing December 1st 2025, but since then the start date had been revised to 5th January 2026.

4.4 Internal Meter Positions

This had been discussed at previous ICP Forums and PC confirmed that the general opinion was that ICPs should be advising developers on acceptable meter positions. MB confirmed this.

4.5 Work Commencing before Design Approval Obtained

PC had advised ICPs that where work commenced before design approval/acceptance was obtained, it would be at the developer/ICP risk. EC asked if this could be made more specific in v11 of the NERS Requirements. PC agreed to include this in the next draft. JL advised that network operators need to be given the opportunity to inspect works.

4.6 Network Operator Audit Failure Rates.

PC advised that this had been raised with ICPs because of unsatisfactory audit failure rates and MC confirmed that whilst sheath faults occurring between testing and audit date could be explainable, items like substation signage missing was not acceptable. PC advised that UKPN's '10 Steps to Compliance' document was seen as best practice and this is available on UKPN's G81 website.

4.7 Communication from INA re Substation Earthing

PC had advised ICPs that this was being seen as an increasing problem which, particularly IDNOs were seeing. As this was an agenda item for the NERSAP meeting it was agreed to defer discussion on this until later in the meeting.

4.8 NERS Passport issues

PC advised that NERS passport issues were consistently the top findings and that the suggested combined NERS passport/confirmation of competency had been well received by the ICP community with one NERS Forum attendee congratulating LRQA on this positive step.

4.9 Substation Construction

PC advised that previously SSEN had experienced problems with ICPs building substations, and that whilst LRQA do not currently assess the civils aspects of substation construction, there was an appetite for this being included. BF advised that by putting this in the NERS requirements, there could be too many variations and that the default position should be ensuring compliance with the respective G81 requirements rather than trying to build a new (NERS) standard because requirements change often. JL commented that there needs to be some governance and someone out there ensuring compliance because it was a deliverable by the ICPs. PC re-affirmed that LRQA is not a substitute for the network operators own compliance regimes.

4.10 NERS ICP Forum Invites

PC advised that Microsoft Teams would only allow 500 invites and so with 500+ ICPs, only 1 invite per ICP would be sent in future and LRQA would rely on that invitee forwarding the invite if they were unable to attend. Many current invitees email addresses are now disused, and PC confirmed that a 'refresh' exercise was underway on the invitee list. The Forum invite list is not the same as the client contact details that LRQA hold for business purposes, as it is generally operational staff that are invited.

4.11 Internal Meter Positions

Discussion had taken place on the prevalence of internally mounted meters, and the emphasis was placed on the ICP to manage their client's expectations by producing some basic developer requirements. The problem being that the IDNO's were learning about this at a late stage of construction because the ICP had not controlled the developer's actions at an early stage. Consensus was that the ICP design organisation should be liaising with the developer at an early stage.

5. Update on NERSAP Strategy Working Group

PC advised that the previously meeting had been cancelled due to low number of attendees accepting the invitation. PC would look to arrange a new date.

6. Update on Management of Design Competency Document Review

TT confirmed that EUSR had extended the closing date to 28th November to allow all interested parties time to comment. MS advised that a meeting with EUSR would be required in order to agree a way forward.

7. Alleged complaint to OFGEM

PC advised that this subject had been added to the agenda at the request of TT from SP ENW.

TT asked if the email from the complainant to LRQA (which was copied to SP ENW by the author), advising that he had made a complaint to OFGEM, had been circulated by LRQA to NERSAP members. PC responded that it had not.

TT advised that an email was sent by the complainant to PC prior to the NERS ICP Forum advising that he had complained to OFGEM regarding blockers to competition regarding the requirement for ICPs to hold Project Management scopes where work is subcontracted (not bought-in labour), and LRQA's interpretation of the NERS requirements as regards the required robustness of competency assessment processes. TT suggested that the reason for the email may have been as a 'heads-up' prior to the meeting which he was planning on attending when he would raise it. In the event, it was not discussed at the NERS ICP Forum and the complainant did not appear on the attendance register.

TT asked that NERSAP review whether or not there are in fact NERS requirements that are anti-competitive. PC responded that the opportunity for raising this with NERSAP had been suggested to the complainant in May 2025 who had instead advised some six months later that he had complained to OFGEM.

MS commented that on the issue of robust competency assessments, this was a legal requirement and that anyone set to work should be properly assessed and therefore did not recognise a situation where LRQA were overly prescriptive in this regard and doubted whether organisations such as HSE would support a less robust process. MS further commented that the NERS requirements are not owned by LRQA and any requirements detailed in the NERS Requirements document are with the knowledge and approval of NERSAP.

DE gave a brief outline of the issues raised during NERS assessments involving the complainant.

MS suggested that one option may be to review the NERS requirements in the areas of complaint in advance of any communication from OFGEM.

JB advised that there needs to be robust competency assessment processes in place which are followed by an Assessing Officer in order to give the Authorising Officer who, in many cases has ultimate responsibility, the confidence that personnel are, in fact competent to carry out the duties for which they are employed. BF confirmed that a less robust competency assessment regime than the one LRQA are assessing could not be supported especially at a time when stakeholders are encouraging LRQA to be more robust.

TT advised that the complainant stated he was happy for his email to LRQA of 11th November to be circulated to other network operators (TT advised in AOB that she would be circulating it).

PC advised that LRQA would await communication from OFGEM and would fully co-operate with them.

8. Letter from INA re substation earthing competency

The letter received from INA in June 2025 and LRQA's response was circulated with the invitation to this meeting by way of background. PC advised that LRQA had been invited to meet with INA members, and LRQA had agreed in principle. MB agreed to advise LRQA of the dates of the next INA Technical sub-committee meetings on Microsoft Teams, so that a mutually convenient date for LRQA to attend can be agreed. MC and EC were also happy to attend.

MB advised that in meetings with some ICPs, the ICPs had stated that as they had passed NERS assessments and surveillance visits, they were not aware that they were deficient in any way, in fact quite the opposite.

DE confirmed that it was the principal design ICPs responsibility to use due diligence when procuring the services of, for example, substation earthing studies and substation earthing installation specialists, and this is potentially where LRQA can require more robust processes.

MC confirmed that UKPN were not seeing issues with design as much as construction operatives' interpretation of design information but is nevertheless a subject that needs action.

DH advised that most issues that he is finding are at the design phase i.e. before construction.

MS advised that there seems to be a lack of competency amongst ICPs, particularly with determining 'hot' and 'cold' sites.

9. Memorandum of Understanding (MoU)

PC advised that this would soon be issued for signature with effect 1st January. This had been sent for review to Karl Miller and Paul Wragg initially.

PW advised that he would review in the next 2-3 days.

TT stated that a comment had been made at a previous meeting about some network operators frustrating the process for signing this but believed that SP ENW had in fact, been very supportive.

10. EUSR 'Right Card' scheme

PC advised that LRQA had proposed to EUSR that for ICPs who were NERS accredited, they could rely on robust competency assessment processes of the ICPs in the knowledge that these processes had been assessed by LRQA. PC pointed out that acceptance of this proposal by EUSR relies on LRQA carrying out thorough

assessments of ICPs respective competency assessment processes and it would undermine EUSR/CSCS confidence if LRQA were to take a lighter approach on this.

MS commented that ENA are still discussing this subject and that LRQA's proposal to EUSR and the extended deadline for implementation is welcomed.

11. NERS Report

PC presented data which will be attached to these minutes. PC agreed to try and obtain detailed data on street lighting transfers which are not counted by IDNOs as new connections.

No major deficiencies were identified in the last reporting period.

PC advised that findings concerning certificates of competency were lower down the findings list and that some encouragement that the proposed combined CoC/passport was gaining some acceptance, could be taken from this data.

12. AOB and dates of 2026 meetings

TT advised that she would share the complainant's email advising that he had made a complaint to OFGEM, with other members of NERSAP. PC restated that LRQA would await communication from OFGEM before deciding on any further action(s).

PC asked about design approvals from NERS accredited Design ICPs which were being rejected by DNOs because a Construction ICP had not been appointed. PC had raised this at the CiCCoP panel and NGED agreed to change their processes to align with the other DNOs and allow designs to be accepted/approved without there necessarily being a Construction ICP in place. Since NGED had changed their processes to align with other DNOs, it was not deemed necessary to alter the CiCCoP to make it clear in the Design section that 'ICP' included Design-only ICPs. LRQA are now receiving complaints from ICPs that 'many' DNOs are not accepting designs without there being a Construction provider in place. PC agreed to circulate the complaints to DNOs for comment and PC advised that he would raise this at the CiCCoP panel in January again. BF commented that the CoP was not specific. TT commented that she was not aware of any rejections and that designs could be accepted from NERS accredited design organisations. MB queried where future liability might lay if the design and construction ICPs were different. DE advised that design is a 'ring-fenced' activity that is available to anyone that wants to procure a design and whoever procures the design has the interface with the adopter when future liabilities are agreed. MS commented that from a commercial point of view where a design was completed by a Design ICP and constructed by a Construction ICP, the adopter may require recourse, and that this may have to be detailed in the NERS requirements. It would be usual to refer back to the Construction ICP who may choose to have 'back-to-back' liability arrangements with the Design ICP. PC agreed to send the complaints to all NERSAP members, so that they could be investigated internally prior to the next CiCCoP panel meeting in January.

PC proposed the dates for the 2026 meetings as:

NERS Provider Forum **10th March***, 14th July, 10th November

NERSAP 24th March, 28th July, 24th November

The above dates were confirmed as acceptable.

PC and PW thanked everyone for their attendance and closed the meeting.

***Post-Meeting Note – the March NERS Provider Forum will now be 11th March 2026, unless any objections are received, due to the previously proposed date clashing with a UKPN stakeholder event.**

DRAFT