

DCUSA DCP 166 Consultation Responses – Collated Comments

Question One	Do you understand the intent of DCP 166?	Working Group Comments
ENWL	Yes	Noted.
PowerCon (UK) Ltd	Yes	Noted.
Northern Powergrid	Yes	Noted.
Renewable Energy Association	Yes	Noted.
SP Distribution / SP Manweb	Yes	Noted.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Yes.	Noted.
UK Power Networks	Yes	Noted.
Western Power	Yes	Noted.

Distribution		
Question Two	Are you supportive of the principles of DCP 166?	Working Group Comments
ENWL	Yes	Noted.
PowerCon (UK) Ltd	We will always be supportive of the principle of clarifying the connection charges – this being to the benefit of customers in general. However with this particular Change Proposal we believe that there must be some acknowledgement and recognition to the fact that where it is not possible to obtain a single phase generator or appliance at the size required, then a three phase supply is really the minimum scheme – as defined.	Noted. The majority of the Working Group agrees with the definition of the Minimum Scheme as set out in DCUSA Schedule 22 between clauses 1.1 and 1.7. The Working Group noted that an alternate Change Proposal DCP 166A would be drafted.
Northern Powergrid	Yes	Noted.
Renewable Energy Association	Supportive of the principle of clarifying the connection charges. Whilst not completely unsympathetic to the principle we would prefer there to be some acknowledgement that where it is not possible to obtain a single phase generator or appliance at the size required, then a three phase supply is really the minimum scheme.	Noted. The majority of the Working Group agrees with the definition of the Minimum Scheme as set out in DCUSA Schedule 22 between clauses 1.1 and 1.7. The Working Group noted that an alternate Change Proposal DCP 166A would be drafted.
SP Distribution / SP Manweb	Yes	Noted.
Southern Electric Power Distribution plc and Scottish Hydro	Yes.	Noted.

Electric Power Distribution plc		
UK Power Networks	Yes	Noted.
Western Power Distribution	Yes. We believe it provides further clarity on the principle that the chargeable 'minimum scheme' is based solely on providing the capacity the customer has requested.	Noted.
Question Three	Do you have any comments on the proposed legal text?	Working Group Comments
ENWL	None	Noted.
PowerCon (UK) Ltd	<p>In line with the above we would prefer the legal text to be altered to:</p> <p>Where you have requested a three phase connection and/or a supply voltage that is not necessary to meet the Required Capacity, and the local distribution system is not of the requested number of phases and/or voltage, then the cost of reinforcing the distribution system to your specified number of phases and/or voltage will be charged to you in full. However for generation or demand of above 50kw and where a three phase supply has been requested the normal apportionment rules will apply if it is not possible to obtain a suitable generator or consumption device to perform the required end use function that operates from a single phase supply.</p> <p>This wording would ensure that 100% of the cost is paid for items below, say, 50kw but for larger items upgrading the supply to a three phase one would be apportioned if it were not practicable for the end user to obtain a suitable single phase device.</p>	<p>Noted. The Working Group discussed the response and considered that the Working Group was split on the introduction of a fixed capacity threshold above which costs would be apportioned. The majority of the Working Group agreed that if a single phase/split phase HV networks was upgraded to three phase then the operation of the 'reinforcement cost apportionment factor' would result in only a small proportion (typically <5%) of the costs being included in the connection charge. The majority of the Working Group was worried that the remainder of the costs would be a burden to be met by the DUoS Customers.</p> <p>Furthermore, the agreement to upgrade a single phase line to three phase above a fixed capacity threshold would provide an insufficient locational signal for Customers and DNOs on the overall cost when investing in the development of an efficient and cost effective</p>

		network design. The Working Group noted that an alternate Change Proposal DCP 166A would be drafted.
Northern Powergrid	No	Noted.
Renewable Energy Association	<p>In line with the above we would prefer the legal text to be altered to:</p> <p><i>Where you have requested a three phase connection and/or a supply voltage that is not necessary to meet the Required Capacity, and the local distribution system is not of the requested number of phases and/or voltage, then the cost of reinforcing the distribution system to your specified number of phases and/or voltage will be charged to you in full. However for generation or demand of above 50kw and where a three phase supply has been requested the normal apportionment rules will apply if it is not possible to obtain a suitable generator or consumption device to perform the required end use function that operates from a single phase supply.</i></p> <p>This wording would ensure that 100% of the cost is paid for items below 50kw but for larger items upgrading the supply to a three phase one would be apportioned if it were not practicable for the end user to obtain a suitable single phase device.</p>	<p>Noted. The Working Group discussed the response and considered that the Working Group was split on the introduction of a fixed capacity threshold above which costs would be apportioned. The majority of the Working Group agreed that if a single phase/split phase HV networks was upgraded to three phase then the operation of the 'reinforcement cost apportionment factor' would result in only a small proportion (typically <5%) of the costs being included in the connection charge. The majority of the Working Group was worried that the remainder of the costs would be a burden to be met by the DUoS Customers.</p> <p>Furthermore, the agreement to upgrade a single phase line to three phase above a fixed capacity threshold would provide an insufficient locational signal for Customers and DNOs on the overall cost when investing in the development of an efficient and cost effective network design. The Working Group noted that an alternate Change Proposal DCP 166A would be drafted.</p>
SP Distribution / SP Manweb	No	Noted.
Southern Electric Power Distribution	We suggest that the words 'reinforcing the distribution network' in the proposed new paragraph 1.12 are changed to 'Reinforcement of the Distribution System' to align with defined terms in the Methodology Statement.	The respondent clarified that the existing text does refer to Distribution system but the intended comment was for this expression to be capitalised in the legal text and for the use of the term reinforcement as opposed

plc and Scottish Hydro Electric Power Distribution plc		to the term reinforcing to be used. The Working Group agreed to amend the legal text accordingly.
UK Power Networks	No	Noted.
Western Power Distribution	We believe the proposed legal text clearly describes the principle upon which charges shall be made where the customer has specific requirements in respect of the voltage level or number of phases to be provided which do not match that resulting from the minimum scheme.	Noted.
Question Four	Do you believe it would be more appropriate for the proposed legal drafting to be amended to include a level of capacity or capacities below which the new clause will apply?	Working Group Comments
ENWL	Yes I believe it would add clarity.	Noted.
PowerCon (UK) Ltd	Yes - We believe that the legal drafting should be amended to acknowledge that connection charge will remain capacity triggered - but subject to a minimum capacity.	Noted. The Working Group noted that an alternate Change Proposal DCP 166A would be drafted.
Northern Powergrid	No. We do not believe that there is a generic level of capacity that can cover all areas of the network. For example we have a customer connected to our network at single phase, 25kV with a capacity of 10MVA. In addition the boundary between single phase, split phase or three phase will depend on the specific characteristics and conditions of	Noted.

	the network being studied.	
Renewable Energy Association	See above. We think that it should not be purely capacity triggered but (subject to a minimum capacity) should be subject to the test of whether it is practicable for the end user to connect to a single phase supply or not.	Noted. The Working Group noted that an alternate Change Proposal DCP 166A would be drafted.
SP Distribution / SP Manweb	No	Noted.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	No. An amendment of this nature would inevitably lead to situations where the general body of customers were burdened with disproportionate levels of cost from 'uneconomic' connection projects ultimately feeding through to use of system charges. In very remote and/or island areas, these costs could be very significant.	Noted.
UK Power Networks	No The text is generic, in keeping with the style of CCCM and will apply equally at all voltage levels and all connections scenarios	Noted.
Western Power Distribution	No. We believe it would be inappropriate to specify any level of capacity as network designs and configurations can evolve over time. The methodology should ideally be generic and reflect	Noted.

	principles that will not generally change.	
Question Five	If you answered 'yes' to question four above what value of capacity or capacities do you believe should be included?	Working Group Comments
ENWL	I believe it should be offered as an alternative for all supplies greater than 100 Kva. (At the review meeting the respondent clarified that normal apportionment rules should apply for supplies above 100kVA.	Noted.
PowerCon (UK) Ltd	We believe that, noting the comments, there should be a consensus opinion derived from industry participants including the building industry, water and sewage authorities and DG community as to what would be a capacity that would be acceptable. In the interim we believe that above 49kw may be an acceptable figure for a three phase supply - but subject to the test that there are not suitable single phase devices available.	Noted. The Working Group noted that an alternate Change Proposal DCP 166A would be drafted.
Northern Powergrid	N/A	Noted.
Renewable Energy Association	50kw for a three phase supply but subject to the test that there are not suitable single phase devices available.	Noted. The Working Group noted that an alternate Change Proposal DCP 166A would be drafted.
SP Distribution / SP Manweb	N/A	Noted.
Southern Electric Power Distribution plc and Scottish	N/A.	Noted.

Hydro Electric Power Distribution plc		
UK Power Networks	n/a	Noted.
Western Power Distribution	Not applicable.	Noted.
Question Six	If you answered 'yes' to the question five above do you believe it is necessary for other parts of the methodology to be amended? If yes, what amendments should be made? (Please include any proposed legal drafting)	Working Group Comments
ENWL	No	Noted.
PowerCon (UK) Ltd	Clause 1.1, defining the minimum scheme should be changed to make it clear that for schemes above, say, 50kw and in cases where a three phase supply has been requested, the provision of a three phase supply should be regarded as the minimum scheme where the conectee would be unable to purchase single phase equipment to perform the function for which the connection was requested.	Noted. The Working Group noted that an alternate Change Proposal DCP 166A would be drafted.
Northern Powergrid	N/A	Noted.
Renewable Energy Association	Clause 1.1, defining the minimum scheme should be changed to make it clear that for schemes above 50kw and in cases where a three phase supply has been requested, the provision of a three phase supply should be regarded as the minimum scheme where the conectee would be unable to purchase single phase equipment	Noted. The Working Group noted that an alternate Change Proposal DCP 166A would be drafted.

	to perform the function that the connection was for.	
SP Distribution / SP Manweb	N/A	Noted.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	N/A.	Noted.
UK Power Networks	No	Noted.
Western Power Distribution	Not applicable.	Noted.
Question Seven	Are there any alternative solutions or matters that should be considered by the Working Group?	Working Group Comments
ENWL	Not that I am aware of	Noted.
PowerCon (UK) Ltd	We are comfortable that the Working Group has considered the multiple options that may be available. There would appear however to be a difference of opinion as to agreeing an acceptable outcome. From a customers perspective the current connections	Noted. The Working Group noted that an alternate Change Proposal DCP 166A would be drafted.

	charging methodology is neither clear nor transparent and the charging methodology (and outcome) has not been defined and is therefore left to the vagaries of the DNO.	
Northern Powergrid	No	Noted.
Renewable Energy Association	The suggestion is a compromise between the original and setting an arbitrary level over which a three phase supply could benefit from apportionment regardless of the reasonable requirement by the connectee for such a connection.	Noted. The Working Group noted that an alternate Change Proposal DCP 166A would be drafted.
SP Distribution / SP Manweb	No	Noted.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	None that we are aware of.	Noted.
UK Power Networks	No	Noted.
Western Power Distribution	We believe the Working Group has explored all the viable alternatives.	Noted.
Question	Are you aware of any wider industry developments that may	Working Group Comments

Eight	impact upon or be impacted by this CP ?	
ENWL	None	Noted.
PowerCon (UK) Ltd	No	Noted.
Northern Powergrid	No	Noted.
Renewable Energy Association	No	Noted.
SP Distribution / SP Manweb	No	Noted.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	No.	Noted.
UK Power Networks	No	Noted.
Western Power Distribution	No.	Noted.

Question Nine	Which DCUSA General Objectives does the CP better facilitate? Please provide supporting comments.	Working Group Comments
	<ol style="list-style-type: none"> 1. The development, maintenance and operation by each of the DNO Parties and IDNO Parties of an efficient, co-ordinated, and economical Distribution System. 2. The facilitation of effective competition in the generation and supply of electricity and (so far as is consistent with that) the promotion of such competition in the sale, distribution and purchase of electricity. 3. The efficient discharge by each of the DNO Parties and IDNO Parties of the obligations imposed upon them by their Distribution Licences. 4. The promotion of efficiency in the implementation and administration of this Agreement and the arrangements under it. 5. compliance with the Regulation on Cross-Border Exchange in Electricity and any relevant legally binding decisions of the 	

	European Commission and/or the Agency for the Co-operation of Energy Regulators.	
ENWL	Objectives 1 & 3	Noted.
PowerCon (UK) Ltd	We believe that Objectives 1, 2 and 3 would be better facilitated on the basis that any amendment would ensure that the distribution system is only converted from single to three phase when either the works are funded entirely by a connectee or the required connection is of over a defined capacity and there is no reasonable alternative such that the apparatus to be connected requires a three phase connection.	Noted.
Northern Powergrid	We believe general objectives 1 and 3 are better facilitated as it ensures that an efficient, coordinated network is maintained. Without this clarity there may be inefficient development of the network and an absence of economic signals.	Noted.
Renewable Energy Association	Objectives 1,2 and 3 as it ensures that the distribution system is only converted from single to three phase when either that is funded entirely by a connectee or the connectee is of over 50kw and has no alternative but to require a three phase connection. By not preventing either generators or demand customers from obtaining a three phase connection when they have no alternative whilst benefitting from the apportionment of costs, competition in generation is facilitated.	Noted.
SP Distribution / SP Manweb	Objective 1 and Objective 3 as the proposal, if implemented, would provide clarity within the methodology	Noted.
Southern Electric Power	See Q10.	Noted.

Distribution plc and Scottish Hydro Electric Power Distribution plc		
UK Power Networks	We agree with the working group assessment.	Noted.
Western Power Distribution	<p>We believe the CP better facilitates DCUSA General Objective 1; 'The development, maintenance and operation by each of the DNO Parties and IDNO Parties of an efficient, co-ordinated, and economical Distribution System'.</p> <p>The CP ensures that DNOs do not 'over engineer' networks unnecessarily.</p> <p>We believe the CP also better facilitates DCUSA General Objective 3; 'The efficient discharge by each of the DNO Parties and IDNO Parties of the obligations imposed upon them by their Distribution Licences.'</p> <p>Licence Condition 13 requires each DNO to have in force a connection charging methodology and this CP allows the DNO to discharge this obligation efficiently by ensuring the methodology is, as far as reasonably possible, balanced and clear.</p>	Noted.
Question Ten	<p>Which DCUSA Charging Objectives does the CP better facilitate?</p> <p>Please provide supporting comments.</p> <p>1. that compliance by each DNO Party with the Charging</p>	Working Group Comments

	<p>Methodologies facilitates the discharge by the DNO Party of the obligations imposed on it under the Act and by its Distribution Licence.</p> <p>2. that compliance by each DNO Party with the Charging Methodologies facilitates competition in the generation and supply of electricity and will not restrict, distort, or prevent competition in the transmission or distribution of electricity or in participation in the operation of an Interconnector (as defined in the Distribution Licences).</p> <p>3. that compliance by each DNO Party with the Charging Methodologies results in charges which, so far as is reasonably practicable after taking account of implementation costs, reflect the costs incurred, or reasonably expected to be incurred, by the DNO Party in its Distribution Business.</p> <p>4. that, so far as is consistent with Clauses 3.2.1 to 3.2.3, the Charging Methodologies, so far as is reasonably practicable, properly take account of developments in each DNO Party's</p>	
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	<p>Distribution Business.</p> <p>5. that compliance by each DNO Party with the Charging Methodologies facilitates compliance with the Regulation on Cross-Border Exchange in Electricity and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.</p>	
ENWL	Objective 1	Noted.
PowerCon (UK) Ltd	<p>We believe that Objective 2 is better facilitated – and for the reasons previous noted.</p> <p>We believe that Objective 3 is better facilitated as the Change Proposal will define the level at which the customer can expect to pay either an apportioned or the full amount of the connection costs for the reinforcement conversion works. Furthermore the applicable charges will be based on sound and defined charging principles rather than current practice of leaving the charging methodology to the discretion of the individual DNO.</p>	Noted.
Northern Powergrid	Better clarity and transparency within the CCCM will assist both customers and distributors.	Noted.
Renewable Energy Association	<p>Objective 2 is better facilitated as described in response to Q9.</p> <p>Objective 3 is better facilitated as the conectee pays either the full cost of conversion from single to three phase or an apportioned amount of the cost in circumstances where it uses a significant amount of the new capacity.</p>	Noted.
SP Distribution / SP Manweb	Objective 1, in addition to improving clarity within the methodology it will assist in maintaining an efficient and economical development of the distribution system.	Noted.

Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	We believe that this CP better facilitates DCUSA Charging Objective 1, as implementation of the proposed additional text would improve the level of explanation of potential connection charges set out within the Connection Charging Methodology. This would assist DNO compliance with Standard Licence Condition 13.1.	Noted.
UK Power Networks	We agree with the working group assessment.	Noted.
Western Power Distribution	We believe the CP better facilitates Objective 1 of the DCUSA Charging Objectives; 'that compliance by each DNO Party with the Charging Methodologies facilitates the discharge by the DNO Party of the obligations imposed on it under the Act and by its Distribution Licence'. We believe the CP improves clarity within the CCCM and enables the DNO to meet its obligation to maintain an efficient and economical Distribution System.	Noted.
Question Eleven	Do you have a preference on the date that DCP166 is implemented into the DCUSA?	Working Group Comments
ENWL	No	Noted.
PowerCon (UK) Ltd	No comment	Noted.

Northern Powergrid	No preference	Noted.
Renewable Energy Association	There is no reason to delay introduction.	Noted.
SP Distribution / SP Manweb	No	Noted.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	We favour the implementation date being the next available DCUSA issue following Authority approval, should the CP be approved.	Noted.
UK Power Networks	No	Noted.
Western Power Distribution	The CP should be implemented into the CCCM as soon as is reasonably practicable.	Noted.