

**DCUSA DCP 200 Consultation Responses – Collated Comments**

<b>Question One</b>	<b>Do you understand the intent of DCP 200?</b>	
<b>Working Group Response Summary</b>	The Working Group noted that all respondents understood the intent of the DCP 200 Change Proposal.	
	<b>Customers</b>	<b>Working Group Comments</b>
<b>Amey Service Ltd</b>	Yes	Noted.
<b>Power Data Associates</b>	Yes	Noted.
	<b>DNOs</b>	<b>Working Group Comments</b>
<b>ENWL</b>	Yes	Noted.
<b>Northern Powergrid</b>	Yes	Noted.
<b>SP Manweb / SP Distribution</b>	Yes we understand the intent of DCP 200	Noted.
<b>Scottish Hydro Electric Power Distribution plc and Southern Electric Power Distribution plc</b>	Yes.	Noted.
<b>UK Power Networks</b>	Yes	Noted.
<b>Question Two</b>	<b>Do you agree with the principles of DCP 200?</b>	

<b>Working Group Response Summary</b>	The Working Group noted that all respondents agreed with the principles of the change.	
	<b>Customers</b>	<b>Working Group Comments</b>
<b>Amey Service Ltd</b>	Yes	Noted.
<b>Power Data Associates</b>	Yes	Noted.
	<b>DNOs</b>	<b>Working Group Comments</b>
<b>ENWL</b>	Yes	Noted.
<b>Northern Powergrid</b>	Yes	Noted.
<b>SP Manweb / SP Distribution</b>	Yes we agree with the principles of DCP 200	Noted.
<b>Scottish Hydro Electric Power Distribution plc and Southern Electric Power Distribution plc</b>	We support the principles of DCP 200.	Noted.
<b>UK Power Networks</b>	Yes	Noted.
<b>Question Three</b>	<b>Do you agree that Clause 1.50 should no longer restrict the scope of contestability to single phase service cable more than one metre from the distribution main?</b>	

<b>Working Group Response Summary</b>	The Working Group noted that all respondents agreed that Clause 1.50 should no longer restrict the scope of contestability to single phase service cable more than one metre from the distribution main.	
<b>Customers</b>		<b>Working Group Comments</b>
<b>Amey Service Ltd</b>	Yes	Noted.
<b>Power Data Associates</b>	Yes	Noted.
<b>DNOs</b>		<b>Working Group Comments</b>
<b>ENWL</b>	Yes	Noted.
<b>Northern Powergrid</b>	Yes	Noted.
<b>SP Manweb / SP Distribution</b>	Yes we agree that Clause 1.50 should no longer restrict the scope of contestability to single phase service cables more than one meter from the distribution main.	Noted.
<b>Scottish Hydro Electric Power Distribution plc and Southern Electric Power Distribution plc</b>	Yes.	Noted.
<b>UK Power Networks</b>	Yes	Noted.
<b>Question Four</b>	<b>Do you agree that the reference to triangular arrangements should be removed from Clause 1.50?</b>	
<b>Working Group Response</b>	The Working Group noted that all respondents agreed that the reference to triangular arrangements should be removed from Clause 1.50.	

<b>Summary</b>		
	<b>Customers</b>	<b>Working Group Comments</b>
<b>Amey Service Ltd</b>	Yes	Noted.
<b>Power Data Associates</b>	Yes	Noted.
	<b>DNOs</b>	<b>Working Group Comments</b>
<b>ENWL</b>	Yes	Noted.
<b>Northern Powergrid</b>	Yes	Noted.
<b>SP Manweb / SP Distribution</b>	Yes we agree that the reference to triangular arrangements should be removed from Clause 1.50.	Noted.
<b>Scottish Hydro Electric Power Distribution plc and Southern Electric Power Distribution plc</b>	Yes.	Noted.
<b>UK Power Networks</b>	Yes	Noted.
<b>Question Five</b>	<b>Do you have any comments on the proposed legal text for DCP 200?</b>	
<b>Working Group Response Summary</b>	The Working Group noted that respondents had no material comments on the DCP 200 legal text.	
	<b>Customers</b>	<b>Working Group Comments</b>

<b>Amey Service Ltd</b>	No	Noted.
<b>Power Data Associates</b>	No	Noted.
<b>DNOs</b>		<b>Working Group Comments</b>
<b>ENWL</b>	No	
<b>Northern Powergrid</b>	The proposed changes will ensure the CCCM reflects current industry practice and improve clarity for the parties involved in this sector.	Noted.
<b>SP Manweb / SP Distribution</b>	No comments.	Noted.
<b>Scottish Hydro Electric Power Distribution plc and Southern Electric Power Distribution plc</b>	No.	Noted.
<b>UK Power Networks</b>	No	Noted.
<b>Question Six</b>	<p><b>Do you consider that the proposal (DCP 200) better facilitates the DCUSA General objectives? Please give supporting reasons.</b></p> <ol style="list-style-type: none"> <li><b>1. The development, maintenance and operation by each of the DNO Parties and IDNO Parties of an efficient, co-ordinated, and economical Distribution System.</b></li> <li><b>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.</b></li> <li><b>3. The efficient discharge by each of the DNO Parties and IDNO Parties of the obligations imposed upon them by their Distribution Licences.</b></li> </ol>	

	<p>4. The promotion of efficiency in the implementation and administration of this Agreement and the arrangements under it.</p> <p>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.</p>	
<b>Working Group Response Summary</b>	The Working Group considered each response and agreed that DCUSA General Objective three was better facilitated by this change as this change fulfils criteria set out under the Distribution Standard Licence Condition (SLC) 4 in particular the 'No abuse of the licensee's special position' at Clause 4.6.	
<b>Customers</b>		<b>Working Group Comments</b>
<b>Amey Service Ltd</b>	YES – it provides a more equitable and fair base for competition and removes potential restrictive elements that can be problematic and used to delay or reduce competition.	Noted.
<b>Power Data Associates</b>	<p>Yes</p> <ol style="list-style-type: none"> <li>1 Removes an artificial barrier to a particular scenario that does not need to exist and is probably enforced to an increasingly varying degree</li> <li>2 n/a</li> <li>3 Removes an artificial barrier to a particular scenario that does not need to exist and is probably enforced to an increasingly varying degree</li> <li>4 The agreement should not be a barrier to effective operational activities, the agreement should reflect the pragmatic operational approach already occurring</li> <li>5 n/a</li> </ol>	Noted.
<b>DNOs</b>		<b>Working Group Comments</b>
<b>ENWL</b>	It supports General Objective 2 – it promotes competition in connections and reflects the extended levels of contestability that have developed in all DNOs	Noted.
<b>Northern Powergrid</b>	Northern Powergrid believes that this proposal is neutral with respect to General Objective 2. We support this change as it improves competition in connections on DNO	Noted.

	<p>networks by providing additional clarity however; we are not convinced it will have any effect on the promotion of competition in distribution since embedded distributors are free to set their own rules for making connections to their networks.</p> <p>General objective 3 is better facilitated as it will clarify the activities that are currently undertaken on a contestable basis and assist in complying with the distribution licence.</p>	
<b>SP Manweb / SP Distribution</b>	We believe that the proposal better meets DCUSA general objective 2, to promote competition.	Noted.
<b>Scottish Hydro Electric Power Distribution plc and Southern Electric Power Distribution plc</b>	We agree with the analysis in the Consultation with regard to General objective 2.	Noted.
<b>UK Power Networks</b>	Yes, we agree that this change better facilitates General Objective 2 by removing unnecessary restrictions.	Noted.
<b>Question Seven</b>	<p><b>Do you consider that the proposal (DCP 200) better facilitates the DCUSA Charging objectives? Please give supporting reasons.</b></p> <ol style="list-style-type: none"> <li><b>1. 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</b></li> <li><b>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)</b></li> <li><b>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</b></li> </ol>	

	<p>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 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>	
<b>Working Group Response Summary</b>	The Working Group unanimously agreed that DCUSA Charging Objective 4 was better facilitated by this change as it aligns DCUSA Schedule 22 CCCM with current DNO business practice and as a result properly takes account of development in each DNO Party's Distribution business.	
<b>Customers</b>		<b>Working Group Comments</b>
<b>Amey Service Ltd</b>	<p>In general Yes. However, I would like to see greater transparency of DNO charges to ensure there can be no cross fertilisation of inter business cost manipulation and that audit costs and planning (whereabouts) requirements harmonise more with the DNO operations i.e. to promote a fair / level playing field.</p> <p>Currently DNOs direct delivery have a tremendous advantage in terms of how they plan and operate a range of connection activities on site versus the ICP regime and the DNO requirements placed upon the ICP ref planning, task instructions and whereabouts and the inflexibility for changes on site where DNOs have such immediate flexibility.</p>	The Working Group noted the response but considered the respondents comments to be outside of the scope of this change.
<b>Power Data Associates</b>	No comment, other than the points above	Noted.
<b>DNOs</b>		<b>Working Group Comments</b>
<b>ENWL</b>	<p>It supports Objective 2 as it promotes competition in connections and reflects the extended levels of contestability that have developed in all DNOs</p> <p>It supports Objective 4 as it reflects developments in what work is now contestable compared to when the CCCM was developed.</p>	Noted.
<b>Northern</b>	Northern Powergrid believes that this proposal is neutral with respect to Charging	Noted.



<b>Powergrid</b>	<p>Objective 2. We support this change as it improves competition in connections on DNO networks by providing additional clarity however; we are not convinced it will have any effect on the promotion of competition in distribution since embedded distributors are free to set their own rules for making connections to their networks.</p> <p>Charging objective 4 is better facilitated as this will allow the CCCM to accurately reflect current industry practice.</p>	
<b>SP Manweb / SP Distribution</b>	We believe that the proposal better meets DCUSA charging objectives 1 and 4. To take account of developments and ensure compliance.	Noted.
<b>Scottish Hydro Electric Power Distribution plc and Southern Electric Power Distribution plc</b>	We agree with the analysis in the Consultation with regard to Charging objectives 1 and 4.	Noted.
<b>UK Power Networks</b>	We agree this better facilitates Charging Objectives 1 and 4 as stated by the proposer.	Noted.
<b>Question Eight</b>	<b>Are you supportive of the proposed implementation date for DCP 200 of next DCUSA release following Authority consent?</b>	
<b>Working Group Response Summary</b>	The Working Group noted that all respondents were supportive of the implementation for DCP 200 of next DCUSA Release following Authority consent.	
<b>Customers</b>		<b>Working Group Comments</b>
<b>Amey Service Ltd</b>	Yes	Noted.

<b>Power Data Associates</b>	Yes  Should also thank WPD for raising the change	Noted.
DNOs		Working Group Comments
<b>ENWL</b>	Yes	Noted.
<b>Northern Powergrid</b>	Yes	Noted.
<b>SP Manweb / SP Distribution</b>	Yes we are supportive of the proposed implementation date.	Noted.
<b>Scottish Hydro Electric Power Distribution plc and Southern Electric Power Distribution plc</b>	Yes.	Noted.
<b>UK Power Networks</b>	Yes	Noted.
<b>Question Nine</b>	<b>Are there any alternative solutions or matters that should be considered by the Working Group?</b>	
<b>Working Group Response Summary</b>	The Working Group noted that respondents had no alternative solutions or matters to be considered by the Working Group within the scope of this change.	
Customers		Working Group Comments
<b>Amey Service Ltd</b>	I would like to see more focus on promoting fairness and equality in terms of the rigid requirements placed on ICPs in terms of planning and operating the range of unmetered connection activities	The Working Group noted the response but considered the respondents comments to be

	<p>on site versus the huge flexibility the DNO direct and contracting services have in terms of changing connection activities on site ie to reflect what they find etc when undertaking connections (planned as a transfer but has to be a mains connection due to site issues of misleading information etc) The DNOs place strict re-planning and change procedures (timescales) on ICPs which is in stark contrast to how they operate themselves. This disadvantages ICPs through inflexibility around making changes on site where DNOs have immediate flexibility.</p> <p>Also, DNOs are imposing restrictive practices in terms of Joint Kit specifications on ICPs without real justification. This needs to be more transparent and DNOs should be more responsive to ICP requests.</p>	outside of the scope of this change.
<b>Power Data Associates</b>	No	Noted.
<b>DNOs</b>		<b>Working Group Comments</b>
<b>ENWL</b>	No	Noted.
<b>Northern Powergrid</b>	No	Noted.
<b>SP Manweb / SP Distribution</b>	None.	Noted.
<b>Scottish Hydro Electric Power Distribution plc and Southern Electric Power Distribution plc</b>	No.	Noted.
<b>UK Power Networks</b>	No	Noted.