**DCP 251 Draft Legal Text**

**Clarification and Extension of the Application of LDNO Tariffs under the CDCM**

**Amend paragraph 1 of Schedule 16 as follows:**

## 1. This Schedule 16 sets out the Common Distribution Charging Methodology (CDCM), which gives the methods, principles, and assumptions underpinning the calculation of Use of System Charges made by each DNO Party operating within its Distribution Services Area.

**Amend paragraph 3 of Schedule 16 as follows:**

## 3. In order to comply with this methodology statement when setting distribution Use of System Charges the DNO Party will populate and publish:

## (a) the CDCM model version [TBC] as issued by the Panel on [TBC][[1]](#footnote-1); and

## (b) the CDCM “Price Control Disaggregation” model version [TBC] as issued by the Panel on [TBC][[2]](#footnote-2).

**Delete Figure 1 in Schedule 16 and replace with the following:**

## 

**Amend paragraph 8 of Schedule 16 as follows:**

## 8. Step 2 is the application of the cost allocation rules set out below. These rules are only for all-the-way tariffs and do not apply to QNO tariffs.

**Amend paragraphs 10 and 11 of Schedule 16 as follows:**

## 10. Step 4 uses price control condition calculations, actual expenditure data and forecast expenditure data in order to determine discount percentages, which are then applied to all-the-way tariffs in order to produce QNO tariffs.

## 11. Step 4 is independent from Steps 1 to 3. In practical terms, Step 4 must be performed first. This is because the discount percentages used to determine QNO tariffs are used within Step 1 to combine volume forecasts for all-the-way tariffs and portfolio tariffs into a single composite dataset for each type of end user.

**Amend paragraph 13 of Schedule 16 as follows:**

## 13. For QNOs, tariffs are applied in respect of users connected to the QNO's network, which comprise the same tariff components as the DNO Party's all-the-way tariffs to equivalent end users, excluding reactive power charges (but prices for some tariff components may be calculated as zero).

**Amend paragraph 53 of Schedule 16 as follows:**

## 53. The volume forecasts for portfolio tariffs are multiplied by the QNO discount percentages determined in Step 4, and combined with the all-the-way volume forecasts for each end user type. These combined volume forecasts are used throughout Steps 2 and 3 of the methodology.

**Amend paragraphs 95 and 96 of Schedule 16 as follows:**

## 95. The final tariffs for demand (before rounding and application of discount percentages for QNOs) are determined on the basis of an allocation with the single adder included in costs. Tariffs for generation do not have any revenue matching element.

## **Step 4: Price control disaggregation**

## 96. Step 4 involves calculations based on price control and expenditure data which produce a series of discount percentages to be used to determine portfolio tariffs.

**Amend paragraph 98 of Schedule 16 as follows[[3]](#footnote-3):**

## 98. The determination of discount percentages involves the following steps:

## (a) Breakdown of price control allowed revenue between operating expenditure, depreciation and return on regulatory asset value.

## (b) Allocation of each of these components of price control allowed revenue to network levels.

## (c) Determination of a percentage allocation of total revenue per unit to network levels.

## (d) Determination of the proportion of the LV mains deemed to be used by LV- connected QNO networks.

## (e) Determination of the proportion of the HV network deemed to be provided by HV-connected QNO networks.

## (f) Calculation of the discount percentage for each combination of boundary network level and end user network level.

**Amend paragraph 114 of Schedule 16 as follows:**

## 114. The DNO Party will procure that the Nominated Calculation Agent estimates for the DNO Party's Distribution Services Area the proportion of the LV mains which LVconnected QNO networks are deemed to use by:

## (a) determining the total length of its LV mains used by LV-connected licensed QNO networks;

## (b) dividing that total length by the number of end users on LV-connected licensed QNO networks; and

## (c) dividing the result by the average length of LV mains by LV end user on the DNO Party’s own LV network.

## The estimates under this paragraph 114 will be based on available data provided by DNO Parties and the IDNO Parties.

**Amend paragraph 116 of Schedule 16 as follows:**

## 116. The DNO Parties will procure that the Nominated Calculation Agent estimates the typical proportion of the HV network which is provided by the DNO Party in the case of HV loads supplied through an HV-connected licensed QNO network. This estimate will be based on sample data, and the average used will be the same for all DNO Parties.

## **Amend paragraphs 119 and 120 of Schedule 16 as follows:**

## 119. For QNO networks with an LV boundary, the discount is equal to:

## [LV: LV discount] = [LV services allocation] + ([LV mains allocation]\*(1 – [LV mains split]\*[LV direct proportion])).

## 120. For QNO networks with an HV boundary, three percentage discount figures are used.

## (a) The percentage discount applicable to tariffs for LV network end users is: [HV: LV discount] = [LV services allocation] + [LV mains allocation] + [HV/LV allocation] + [HV allocation]\*(1 – [HV split]\*[HV direct proportion]).

## (b) The percentage discount applicable to tariffs for LV substation end users is: [HV: LV Sub discount] = ([HV/LV allocation] + [HV allocation]\*(1-[HV split]\*[HV direct proportion]))/(1-[LV mains allocation] – [LV services allocation]).

**Amend paragraphs 124 and 125 of Schedule 16 as follows:**

## 124. For demand users, the discount percentages are applied to all tariff components in all-the-way tariffs in order to determine QNO network portfolio tariffs.

## 125. For generation users, the unit rate element (p/kWh) is not discounted, reflecting the modelling assumption that generation benefits are seen at the voltage level above the Exit Point, and therefore the QNO simply “passes on” the benefits seen at the DNO Party level. The fixed charge element (p/day) is discounted at 100 per cent, as this tariff component in the all-the-way tariff recovers costs associated with the allocation of other expenditure to service assets, which are not provided by the DNO Party.

**Amend paragraph 127 of Schedule 16 as follows:**

## 127. This part details the common tariff structure and associated tariff elements for Non-Half Hourly (NHH), Half-Hourly (HH) site-specific and HH aggregated metered supplies for demand and generation, for unmetered supplies and for charges to QNOs.

**Amend paragraph 147 of Schedule 16 as follows:**

## **Tariff structures for QNOs**

## 147. The tariff structure for QNOs will replicate the structure that the DNO Party uses in setting its all-the-way-tariffs to its equivalent end users.

**Amend heading of Table 8 in Schedule 16 as follows:**

## **Table 8: QNO LV connection\***

**Amend footnote to Table 8 in Schedule 16 as follows:**

## \* Where the boundary between the QNO and DNO Party's network is at LV

**Amend heading of Table 9 in Schedule 16 as follows:**

## **Table 9: QNO HV connection\***

**Amend paragraph 151 of Schedule 16 as follows:**

## 151. For QNO connections, if capacity ramping has been agreed with the DNO Party, in accordance with the DNO Party’s connection charging methodology, the phasing profile will apply instead of the above rules. Where a QNO has agreed a phasing of capacity this will be captured in the Bilateral Connection Agreement with the DNO Party.

## **Amend the following definitions in the Glossary of Terms used in this Schedule 16:**

|  |  |
| --- | --- |
| **all-the-way tariff** | a tariff applicable to an end user connected directly to the DNO Party's network. |
|  |  |
|  |  |
| **end user** | is a user, but excluding QNOs. |
| **portfolio tariff** | a tariff for use of the DNO Party’s network by a QNO whose network is connected to the DNO Party's network. |
| **user** | refers to customers (whether demand customers or generators) and (where relevant) QNOs. |

## **Add the following definition to the Glossary of Terms used in this Schedule 16:**

|  |  |
| --- | --- |
| **Qualifying Network Operator (QNO)** | means one of the following:(a) an IDNO Party (or DNO Party operating a network outside its Distribution Services Area), whose network is connected to the network of a DNO Party operating within its Distribution Services Area, where the IDNO Party (or DNO Party operating a network outside its Distribution Services Area) receives use of system from the DNO Party for the purpose of conveying electricity to or from premises or distribution systems connected to the network of the IDNO Party (or DNO Party operating a network outside its Distribution Services Area); or(b) any person who does not hold an electricity distribution licence (and who has confirmed that it is exempt under the Act from the requirement to hold an electricity distribution licence), whose network is connected to the network of a DNO Party operating within its Distribution Services Area, where that person has contracted with the DNO Party for use of system for the purpose of conveying electricity to or from premises or distribution systems connected to that person's network; but only where:(i) the premises connected to that person's network (or premises connected to distribution systems connected to that person's network) import or export electricity through a Metering Point; and(ii) that person has contracted with the DNO Party (or another DNO/IDNO Party) for Data Services and any other relevant Distribution Business services for which an IDNO Party ordinarily contracts with the DNO Party (so that the DNO Party can treat that person on the same equivalent basis as the DNO Party treats IDNO Parties). |

**Amend paragraph 1.1 of Schedule 20 as follows:**

## 1.1 The “Annual Review Pack” or “ARP” is a document to be completed by each DNO Party giving indicative (when first published in accordance with Clause 35B) and final (when updated in accordance with Clause 35B) Use of System Charges to apply pursuant to the Charging Methodology set out in Schedule 16 (the “CDCM”). The pack shall contain detail of historical and forecast CDCM inputs, and a forecast of use of system tariffs for the next 5 years, in accordance with Paragraph 2. The template to be used for the pack shall be ARP model version [TBC] as issued by the Panel on [TBC][[4]](#footnote-4).

## **Add the heading and paragraph 1 of the new Schedule to be implemented under DCP 234 as follows:**

# Schedule [X] - Calculation of Discount Percentages for the Purpose of Determining Certain qno Use of System Charges under Schedules 16, 17 and 18

1. This Schedule forms part of the CDCM and the EDCMs. It describes the methodology for the calculation of discount percentages for the purpose of determining certain QNO use of system charges under Schedules 16, 17 and 18.

## **Amend the new Schedule to be implemented under DCP 234 as follows:**

## *In the following paragraphs, replace the words "embedded networks" with the words "QNO networks":*

## *paragraph 3(d)*

## *paragraph 3(e)*

## *paragraph 33*

## *paragraph 33(a)*

## *paragraph 33(b)*

## *paragraph 36*

## *paragraph 40*

## *paragraph 41*

## *paragraph 42*

## *paragraph 43*

## *paragraph 44*

## *paragraph 45*

## *paragraph 46*

## *In the following paragraphs (as amended in accordance with the above bullet point) add the word "licensed" immediately before the words "QNO network":*

## *paragraph 33(a)*

## *paragraph 33(b)*

## *paragraph 36*

## *In the formula in paragraph 37, replace the word "IDNO" (on both occasions it is used) with the words "licensed QNO".*

## **Gowling WLG (UK) LLP 3 April 2017**

1. The model version number and date are to be added at the direction of the Panel on implementation. [↑](#footnote-ref-1)
2. The model version number and date are to be added at the direction of the Panel on implementation. [↑](#footnote-ref-2)
3. Interaction with DCP234 – Paragraphs 98, 114, 116, 119 and 120 are to be deleted by DCP234. These deletions will still be made on implementation of DCP234, notwithstanding this DCP251. If DCP251 is implemented after DCP234, the changes to these paragraphs will be ignored (as DCP234 will already have deleted them). [↑](#footnote-ref-3)
4. The model version number and date are to be added at the direction of the Panel on implementation. [↑](#footnote-ref-4)